

CAUSE NO. DC-21-12258

NAOMI WISENER

Plaintiff,

vs.

AMWAY CORP.; ET AL.

Defendants.

IN THE DISTRICT COURT

14TH JUDICIAL DISTRICT

DALLAS COUNTY, TEXAS

EXHIBIT B
STATE COURT DOCUMENTS

Pleadings 1

Case Information

DC-21-12258 | NAOMI WISENER, et al vs. AMWAY CORP., et al

Case Number	Court	Judicial Officer
DC-21-12258	14th District Court	MOYE', ERIC
File Date	Case Type	Case Status
09/01/2021	OTHER (CIVIL)	OPEN

Party

PLAINTIFF

WISENER, NAOMI

Address

SIMON GREENSTONE PANATIER, PC
1201 ELM STREET, SUITE 3400
DALLAS TX 75270

Active Attorneys ▾

Lead Attorney
PETERSON, HOLLY C
Retained

Inactive Attorneys ▾

Attorney
MONTEMAYOR, JENNIFER
Retained

Work Phone

214-276-7680

Fax Phone

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PLAINTIFF

WISENER, NAOMI

Address

1201 Elm Street, Suite 3400
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Active Attorneys ▾

Lead Attorney
PETERSON, HOLLY C
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DEFENDANT
AMWAY CORP.

Address
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1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

Active Attorneys ▾
Lead Attorney
HICKS, JAKE
Retained

DEFENDANT
CHARLES B. CHRYSAL COMPANY, INC.

Active Attorneys ▾
Lead Attorney
BARRON, BARBARA JANE
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DEFENDANT
BROOKSHIRE GROCERY COMPANY

Address
SERVING ITS REGISTERED AGENT, ROSEMARY JONES
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Active Attorneys ▾
Lead Attorney
SPEER, AARON M.
Retained

DEFENDANT
BRENNETAG NORTH AMERICA, INC.

DEFENDANT
BLOCK DRUG CORPORATION

DEFENDANT
BAYER CONSUMER CARE HOLDINGS LLC

Aliases
FKA BAYER CONSUMER CARE LLC
FKA MSD CONSUMER CARE, INC.) FOR ITS DR SCHOLL'S LINE
OF PRODUCTS

DEFENDANT
BRENNETAG SPECIALTIES LLC

Aliases
FKA BRENNETAG SPECIALTIES, INC
FKA MINERAL PIGMENT SOLUTIONS, INC,
Address

SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

DEFENDANT
BLOCK DRUG COMPANY, INC.

Address
SERVING ITS REGISTERED AGENT, PRENTICE-HALL CORPORATION
SYSTEM
211 E. 7TH STREET, SUITE 620
AUSTIN TX 78701

DEFENDANT
BAYER HEALTHCARE LLC

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN TX 78701

DEFENDANT
BARRETT'S MINERALS INC.

Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
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Active Attorneys ▾
Lead Attorney
FRAZIER, MARY E.
Retained

DEFENDANT
AVON PRODUCTS, INC.

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SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3104

DEFENDANT
HIMMEL MANAGEMENT CO. LLC

Aliases
AKA HIMMEL GROUP
MARTING HIMMEL, INC.
DBA MARTIN HIMMEL, INC.

DEFENDANT
AVENTIS INC.

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
2595 INSTERSTATE DRIVE, SUITE 103
HARRISBURG PA 17110

Active Attorneys ▾
Lead Attorney
ELLISTON, GARY D
Retained

DEFENDANT
ARKEMA, INC.

Aliases
FKA PENNWALT CORPORATION
FKA NORHT AMERICA, INC.

Address
SERVING ITS REGISTERED AGENT, LAWYERS INCORPORATING
SERIVEC
211 E. 7TH STREET, SUITE 620
DALLAS TX 78701

Active Attorneys ▾
Lead Attorney
HENDRYX, MICHAEL
Retained

DEFENDANT
L'OREAL USA, INC.

Address
SERVING ITS REGISTERED AGENT, PRENTICE-HALL COPORATION
SYSTEM
251 LITTLE FALLS DRIVE
WILMINGTON DE 19808

DEFENDANT
H-E-B, LP

Address
SERVING ITS REIGISTERED AGENT, ABEL MARTINEZ
646 S. FLORES STREET
SAN ANTONIO TX 78204-1219

DEFENDANT
GSK CONSUMER HEALTH, INC.

Aliases
FKA NOVARTIS CONSUMER HEALTH, INC.
*FKA CIBA SELF-MEDICATION, INC., FOR ITS DESENEX LINE OF
PRODUCTS*

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
251 LITTLE FALLS DRIVE

WILMINGTON DE 19808

DEFENDANT
GLAXOSMITHKLINE LLC

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN TX 78701

DEFENDANT
FISONS CORPORATION

Address
SERVING ITS REGISTERED AGENT, CORPORATE CREATIONS
NETWORK INC.
5444 WESTHEIMER ROAD, SUITE 1000
HOUSTON TX 77056-5318

Active Attorneys ▾
Lead Attorney
ELLISTON, GARY D
Retained

DEFENDANT
ELIZABETH ARDEN, INC.

Address
SERVING ITS REGISTERED AGENT, CORPORATE CREATIONS
NETWORK INC.
5444 WESTHEIMER ROAD, SUITE 1000
HOUSTON TX 77056-5318

DEFENDANT
DR. SCHOLL'S LLC

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
251 LITTLE FALLS DRIVE
WILMINGTON DE 19808

DEFENDANT
CROWN LABORATORIES, INC.

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICES
COMPANY
251 LITTLE FALLS DRIVE
WILMINGTON TX 19808

DEFENDANT
COTY, INC.

Address
SERVING ITS REGISTERED AGENT, CORPORATION SERVICE
COMPANY
251 LITTLE FALLS DRIVE
WILMINGTON DE 19808

DEFENDANT
COSMETIC SPECIALTIES, INC.

Address
SERVING ITS REGISTERED AGENT, RONALD W. GREXA
125 WHITE HORSE PIKE
HADDON HEIGHTS NJ 08035

DEFENDANT
CONOPCO, INC.

Aliases
AKA UNILEVER HOME & PERSONAL CARE USA
Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

DEFENDANT
COLGATE-PALMOLIVE COMPANY

Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

Active Attorneys ▾
Lead Attorney
DANIEL, AUSTIN COLYER
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DEFENDANT
CHATTEM, INC.

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COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN TX 78701

Active Attorneys ▾
Lead Attorney
ELLISTON, GARY D
Retained

DEFENDANT
REVLON CONSUMER PRODUCTS CORPORATION

DEFENDANT
PUIG USA, INC.,

Active Attorneys ▾
Lead Attorney
SAROKHANIAN, NICHOLAS A
Retained

DEFENDANT
PTI UNION, LLC

Aliases
AKA PHARMA TECH INDUSTRIES

DEFENDANT
THE PROCTER & GAMBLE COMPANY

DEFENDANT
NOXELL CORPORATION

DEFENDANT
NOVARTIS CORPORATION

DEFENDANT
NINA RICCI USA, INC.

Active Attorneys ▾
Lead Attorney
SAROKHANIAN, NICHOLAS A
Retained

DEFENDANT
SCHOLL'S WELLNESS COMPANY LLC

DEFENDANT
SANOFI US SERVICES, INC.

Active Attorneys ▾
Lead Attorney
ELLISTON, GARY D

Retained

DEFENDANT
MAYBELLINE LLC

DEFENDANT
WHITTAKER CLARK & DANIELS, INC.

DEFENDANT
UNILEVER UNITED STATES, INC.

DEFENDANT
SPECIALTY MINERALS INC.

Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

Active Attorneys ▾
Lead Attorney
FRAZIER, MARY E.
Retained

DEFENDANT
SANOFI-AVENTIS U.S. LLC

Address
SERVING ITS REGISTERED AGENT, LAWYERS INCORPORATING
SERVICE
211 E. 7TH STREET, SUITE 620
AUSTIN TX 78701

Active Attorneys ▾
Lead Attorney
ELLISTON, GARY D
Retained

DEFENDANT
PFIZER INC.

Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

Active Attorneys ▾
Lead Attorney
FRAZIER, MARY E.
Retained

DEFENDANT
MERCK & CO., INC.

Active Attorneys ▾
Lead Attorney

Address
SERVING ITS REGISTERED AGENT, CT CORPORATION SYSTEM
1999 BRYAN STREET, SUITE 900
DALLAS TX 75201-3140

EDWARDS, BRADY
Retained

DEFENDANT
AVENTIS INC., for its Desenex line of products

DEFENDANT
H-E-B, LP

Active Attorneys ▾
Lead Attorney
OLVERA, RUBEN
Retained

Events and Hearings

09/01/2021 NEW CASE FILED (OCA) - CIVIL

09/01/2021 CASE FILING COVER SHEET ▾

CIVIL CASE COVER SHEET

09/01/2021 ORIGINAL PETITION ▾

PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND

09/01/2021 REQUEST FOR SERVICE ▾

REQUEST LETTER

09/01/2021 ISSUE CITATION ▾

ISSUE CITATION-AMWAY CORP

ISSUE CITATION- ARKEMA INC.

ISSUE CITATION-AVON PRODUCTS INC.

ISSUE CITATION-BARRETT'S MINERALS INC.

ISSUE CITATION-BAYER HEALTHCARE LLC

ISSUE CITATION-BLOCK DRUG COMPANY INC.

ISSUE CITATION-BRENNTAG SPECIALTIES LLC

ISSUE CITATION-BROOKSHIRE GROCERY COMPANY

ISSUE CITATION-CHATTEM INC.

ISSUE CITATION-COLGATE-PALMOLIVE COMPANY

ISSUE CITATION-CONOPCO INC.

ISSUE CITATION-ELIZABETH ARDEN, INC.

ISSUE CITATION-GLAXOSMITHKLINE LLC

ISSUE CITATION-H-E-B., LP

ISSUE CITATION-MERCK & CO., INC.

ISSUE CITATION-PFIZER INC,

ISSUE CITATION-SANOFI-AVENTIS U.S., LLC

ISSUE CITATION-SPECIALTY MINERALS INC.

09/01/2021 JURY DEMAND

09/01/2021 ISSUE CITATION COMM OF INS OR SOS ▾

ISSUE CITATION COMM OF INS OR SOS-BAYER CONSUMER CARE HOLDINGS LLC

ISSUE CITATION COMM OF INS OR SOS-GSK CONSUMER HEALTH, INC.

ISSUE CITATION COMM OF INS OR SOS- HIMMEL MANAGEMENT CO LLC

ISSUE CITATION COMM OF INS OR SOS- L'OREAL USA, INC.

ISSUE CITATION COMM OF INS OR SOS- MAYBELLINE LLC

ISSUE CITATION COMM OF INS OR SOS-BLOCK DRUG CORPORATION

ISSUE CITATION COMM OF INS OR SOS-BRENNTAG NORTH AMERICA, INC.

ISSUE CITATION COMM OF INS OR SOS-CHARLES B. CHRYSSTAL COMPANY, INC.

ISSUE CITATION COMM OF INS OR SOS-COSMETICS SPECIALTIES, INC.

ISSUE CITATION COMM OF INS OR SOS-COTY, INC.

ISSUE CITATION COMM OF INS OR SOS-CROWN LABORATORIES, INC.

ISSUE CITATION COMM OF INS OR SOS-DR. SCHOLL'S LLC

ISSUE CITATION COMM OF INS OR SOS-FISONS CORPORATION

ISSUE CITATION COMM OF INS OR SOS-NINA RICCI USA, INC.

ISSUE CITATION COMM OF INS OR SOS-NOVARTIS CORPORATION

ISSUE CITATION COMM OF INS OR SOS-NOXELL CORPORATION

ISSUE CITATION COMM OF INS OR SOS-THE PROCTER & GAMBLE COMPANY

ISSUE CITATION COMM OF INS OR SOS-PTI UNION , LLC

ISSUE CITATION COMM OF INS OR SOS-PUIG USA INC.

ISSUE CITATION COMM OF INS OR SOS-REVLON CONSUMER PRODUCTS CORPORATION

ISSUE CITATION COMM OF INS OR SOS-SANOFI US SERVICES,INC.

ISSUE CITATION COMM OF INS OR SOS-SCHOLL'S WELLNESS COMPANY LLC

ISSUE CITATION COMM OF INS OR SOS-UNILEVER UNITED STATES,INC.

ISSUE CITATION COMM OF INS OR SOS-WHITTAKER CLARK & DANIELS, INC.

09/09/2021 REQUEST FOR SERVICE ▾

PAYMENT OF ADDITIONAL FEES

Comment

PAYMENT OF ADDITIONAL FEES

09/09/2021 CITATION ▾

Served

09/28/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

AMWAY CORP

09/09/2021 CITATION ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

ARKEMA INC.

09/09/2021 CITATION ▾

Served

09/28/2021

Anticipated Server

ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
AVON PRODUCTS INC.

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
BARRETT'S MINERALS INC.

09/09/2021 CITATION ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
BAYER HEALTHCARE LLC

09/09/2021 CITATION ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
BLOCK DRUG COMPANY INC.

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
BRENNETAG SPECIALTIES LLC

09/09/2021 CITATION ▾

Served
09/24/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
BROOKSHIRE GROCERY COMPANY

09/09/2021 CITATION ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
CHATTEM INC.

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
COLGATE-PALMOLIVE COMPANY

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
CONOPCO INC.

09/09/2021 CITATION ▾

Served
09/29/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
ELIZABETH ARDEN, INC.

09/09/2021 CITATION ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
GLAXOSMITHKLINE LLC

09/09/2021 CITATION ▾

Served
09/27/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
H-E-B-, LP

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
MERCK & CO., INC.

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
PFIZER INC,

09/09/2021 CITATION ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
SANOFI-AVENTIS U.S., LLC

09/09/2021 CITATION ▾

Served
09/28/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
SPECIALITY MINERALS INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
AVENTIS INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
BAYER CONSUMER CARE HOLDINGS LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
GSK CONSUMER HEALTH, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
HIMMEL MANAGEMENT CO LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
L'OREAL USA, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method

Actual Server

ESERVE

Returned

10/07/2021

Comment

MAYBELLINE LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

BLOCK DRUG CORPORATION

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

BRENNETAG NORTH AMERICA, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

CHARLES B. CHRYSSTAL COMPANY, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
COSMETICS SPECIALTIES, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
COTY, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
OUT OF COUNTY

Returned
10/07/2021
Comment
CROWN LABORATORIES, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

DR. SCHOLL'S LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

OUT OF COUNTY

Returned

10/07/2021

Comment

FISONS CORPORATION

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

NINA RICCI USA, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

NOVARTIS CORPORATION

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

NOXELL CORPORATION

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

THE PROCTER & GAMBLE COMPANY

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method

Actual Server

PRIVATE PROCESS SERVER

Returned

10/07/2021

Comment

PTI UNION , LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served

09/30/2021

Anticipated Server

ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
PUIG USA INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
REVLON CONSUMER PRODUCTS CORPORATION

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
ESERVE

Returned
10/07/2021
Comment
SANOFI US SERVICES, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
SCHOLL'S WELLNESS COMPANY LLC

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
UNILEVER UNITED STATES, INC.

09/09/2021 CITATION SOS/COI/COH/HAG ▾

Served
09/30/2021

Anticipated Server
ESERVE

Anticipated Method
Actual Server
PRIVATE PROCESS SERVER

Returned
10/07/2021
Comment
WHITTAKER CLARK & DANIELS, INC.

09/10/2021 REQUEST FOR SERVICE ▾

REQUEST FOR SERVICE

10/07/2021 RETURN OF SERVICE ▾

CITATION EXCUTED HIMMEL MANAGEMENT CO LLC

Comment
CITATION EXCUTED HIMMEL MANAGEMENT CO LLC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION L'OREAL USA INC

Comment
EXCUTED CITATION L'OREAL USA INC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION MAYBELLINE LLC

Comment

EXCUTED CITATION MAYBELLINE LLC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION MERCK & CO INC

Comment

EXCUTED CITATION MERCK & CO INC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION NINA RICCI USA INC

Comment

EXCUTED CITATION NINA RICCI USA INC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION NOVARTIS CORPORATION

Comment

EXCUTED CITATION NOVARTIS CORPORATION

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION NOXELL CORPORATION

Comment

EXCUTED CITATION NOXELL CORPORATION

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION PIFIZER INC

Comment

EXCUTED CITATION PIFIZER INC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION THE PROCTER & GAMBLE COMPANY

Comment

EXCUTED CITATION THE PROCTER & GAMBLE COMPANY

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION PTI UNION LLC

Comment

EXCUTED CITATION PTI UNION LLC

10/07/2021 RETURN OF SERVICE ▾

EXCUTED CITATION PUIG USA INC

Comment

EXECUTED CITATION PUIG USA INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION REVOLN CONSUMER PRODUCTS CORPORATION

Comment

EXECUTED CITATION REVOLN CONSUMER PRODUCTS CORPORATION

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION SANOFI- AVENTIS US LLC

Comment

EXECUTED CITATION SANOFI- AVENTIS US LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION SANOFI US SERVICES INC

Comment

EXECUTED CITATION SANOFI US SERVICES INC

10/07/2021 RETURN OF SERVICE ▾

Affidavit of Service-Scholls Wellness Company LLC-5164.pdf

Comment

Scholl's Wellness Company LLC

10/07/2021 RETURN OF SERVICE ▾

Affidavit of Service-Specialty Minerals Inc-5165.pdf

Comment

EXECUTED CITATION SPECIALTY MINERALS INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION UNILEVER UNITED STATES INC

Comment

EXECUTED CITATION UNILEVER UNITED STATES INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION WHITTAKER CLARK & DANIELS INC

Comment

EXECUTED CITATION WHITTAKER CLARK & DANIELS INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BROOKSHIRE GROCERY COMPANY

Comment

EXECUTED CITATION - BROOKSHIRE GROCERY COMPANY

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - H-E-B, LP

Comment

EXECUTED CITATION - H-E-B, LP

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - AMWAY CORP

Comment

EXECUTED CITATION - AMWAY CORP

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - ARKEMA INC

Comment

EXECUTED CITATION - ARKEMA INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - AVENTIS INC

Comment

EXECUTED SOS CITATION - AVENTIS INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - AVON PRODUCTS INC

Comment

EXECUTED CITATION - AVON PRODUCTS INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BARRETTS MINERALS INC

Comment

EXECUTED CITATION - BARRETTS MINERALS INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC

Comment

EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BAYER HEALTHCARE LLC

Comment

EXECUTED CITATION - BAYER HEALTHCARE LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BLOCK DRUG COMPANY INC

Comment

EXECUTED CITATION - BLOCK DRUG COMPANY INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - BLOCK DRUG CORPORATION

Comment

EXECUTED SOS CITATION - BLOCK DRUG CORPORATION

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - BRENNETAG NORTH AMERICA INC

Comment

EXECUTED SOS CITATION - BRENNETAG NORTH AMERICA INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - BRENNETAG SPECIALTIES LLC

Comment

EXECUTED CITATION - BRENNETAG SPECIALTIES LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - CHARLES B CHRYSSTAL COMPANY INC

Comment

EXECUTED SOS CITATION - CHARLES B CHRYSSTAL COMPANY INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - CHATTEM INC

Comment

EXECUTED CITATION - CHATTEM INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - COLGATE-PALMOLIVE COMPANY

Comment

EXECUTED CITATION - COLGATE-PALMOLIVE COMPANY

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - CONOPCO INC

Comment

EXECUTED CITATION - CONOPCO INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC

Comment

EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - COTY INC

Comment

EXECUTED SOS CITATION - COTY INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - CROWN LABORATORIES INC

Comment

EXECUTED SOS CITATION - CROWN LABORATORIES INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - DR SCHOLLS LLC

Comment

EXECUTED SOS CITATION - DR SCHOLLS LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - ELIZABETH ARDEN INC

Comment

EXECUTED CITATION - ELIZABETH ARDEN INC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - FISONS CORPORATION

Comment

EXECUTED SOS CITATION - FISONS CORPORATION

10/07/2021 RETURN OF SERVICE ▾

EXECUTED CITATION - GLAXOSMITHKLINE LLC

Comment

EXECUTED CITATION - GLAXOSMITHKLINE LLC

10/07/2021 RETURN OF SERVICE ▾

EXECUTED SOS CITATION - GSK CONSUMER HEALTH INC

Comment

EXECUTED SOS CITATION - GSK CONSUMER HEALTH INC

10/13/2021 NOTICE OF DISMISSAL FOR WANT OF PROSECUTION ▾

NOTICE OF DISMISSAL FOR WANT OF PROSECUTION

Comment

MAILED

10/18/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

ORIGINAL ANSWER/MOTION TO TRANSFER/DISMISS/SPECIAL EXCEPTIONS

Comment

SPECIAL EXCEPTIONS

10/18/2021 MOTION - TRANSFER - CHANGE OF VENUE ▾

MOTION TO TRANSFER VENUE

10/18/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

ORIGINAL ANSWER

10/18/2021 MOTION - TRANSFER - CHANGE OF VENUE ▾

ORIGINAL ANSWER/MOTION TO TRANSFER/DISMISS/SPECIAL EXCEPTIONS

Comment

DISMISS

10/19/2021 MISCELLANOUS EVENT ▾

NOTICE OF CHANGE OF ATTORNEY OF RECORD

Comment

NOTICE OF CHANGE OF ATTORNEY OF RECORD

10/19/2021 NON-SIGNED PROPOSED ORDER/JUDGMENT ▾

PROPOSED ORDER SUBSTITUTE COUNSEL

Comment

PROPOSED ORDER CHANGE ATTORNEY OF RECORD

10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

AND MOTION TRANSFER VENUE

10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾

SPECIALTY MINERALS INCL
10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
BARRETT'S MINERALS INC.
10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
ORIGINAL ANSWER - CHARLES B CHRYSAL COMPANY INC.
10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
COLGATE'S ORIGINAL ANSWER AND OTHERS
Comment SPECIAL APPEARANCE, MOTION TO TRANSFER, MOTION TO DISMISS, SPECIAL EXCEPTIONS, AND RESPONSE TO CROSS CLAIMS
10/22/2021 MOTION - TRANSFER - CHANGE OF VENUE ▾
AND MOTION TRANSFER VENUE
10/22/2021 MOTION - TRANSFER - CHANGE OF VENUE ▾
ORIGINAL ANSWER - CHARLES B CHRYSAL COMPANY INC.
10/22/2021 MOTION - TRANSFER - CHANGE OF VENUE ▾
COLGATE'S ORIGINAL ANSWER AND OTHERS
10/22/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
ORIGINAL ANSWER - ARKEMA INC.
Comment AND MOTION TO TRANSFER
10/25/2021 ORDER - SUBSTITUTION OF COUNSEL ▾
ORDER - SUBSTITUTION OF COUNSEL
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
ORIGINAL ANSWER AND ANSWER TO ALL CROSS CLAIMS
Comment AND ANSWER TO ALL CROSS CLAIMS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▾
ORIGINAL ANSWER

Comment AND ANSWERS TO ALL CROSS CLAIMS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER - FISONS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER
Comment AND ANSWERS TO ALL CROSS CLAIMS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER/ MOTION TO TRANSFER VENUE/DISMIS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER - CHATTEM, INC.
10/25/2021 MOTION - TRANSFER - CHANGE OF VENUE ▼
ORIGINAL ANSWER/ MOTION TO TRANSFER VENUE/DISMIS
10/25/2021 MOTION - DISMISS ▼
ORIGINAL ANSWER/ MOTION TO TRANSFER VENUE/DISMIS
10/25/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼
ORIGINAL ANSWER - MERCK AND CO., INC.
10/26/2021 NOTICE OF TRIAL ▼
Comment MAILED - LVL 3
10/26/2021 TRIAL SETTING (JURY)
11/15/2021 DISMISSAL FOR WANT OF PROSECUTION ▼
Judicial Officer MOYE', ERIC

Hearing Time
1:30 PM

Cancel Reason
BY COURT ADMINISTRATOR

12/03/2021 Scheduling Conference ▾

Judicial Officer
MOYE', ERIC

Hearing Time
10:00 AM

Comment
NOT A HERAING - HAS S/O BEEN RECEIVED?

08/30/2022 Jury Trial - Civil ▾

Judicial Officer
MOYE', ERIC

Hearing Time
9:30 AM

Financial

WISENER, NAOMI

Total Financial Assessment	\$788.00
Total Payments and Credits	\$788.00

9/3/2021	Transaction Assessment	\$676.00
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9/3/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 58492-2021- DCLK	WISENER, NAOMI	(\$676.00)
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9/9/2021	Transaction Assessment	\$100.00
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9/9/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 59439-2021- DCLK	WISENER, NAOMI	(\$100.00)
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9/13/2021	Transaction Assessment	\$12.00
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9/13/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 60809-2021- DCLK	WISENER, NAOMI	(\$12.00)
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BROOKSHIRE GROCERY COMPANY

Total Financial Assessment	\$40.00
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Total Payments and Credits		\$40.00
10/19/2021	Transaction Assessment	\$40.00
10/19/2021	CREDIT CARD - TEXFILE (DC)	Receipt # 69770-2021-DCLK BROOKSHIRE GROCERY COMPANY (\$40.00)

Documents

CIVIL CASE COVER SHEET
 PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND
 REQUEST LETTER
 ISSUE CITATION-AMWAY CORP
 ISSUE CITATION- ARKEMA INC.
 ISSUE CITATION-AVON PRODUCTS INC.
 ISSUE CITATION-BARRETT'S MINERALS INC.
 ISSUE CITATION-BAYER HEALTHCARE LLC
 ISSUE CITATION-BLOCK DRUG COMPANY INC.
 ISSUE CITATION-BRENNTAG SPECIALTIES LLC
 ISSUE CITATION-BROOKSHIRE GROCERY COMPANY
 ISSUE CITATION-CHATTEM INC.
 ISSUE CITATION-COLGATE-PALMOLIVE COMPANY
 ISSUE CITATION-CONOPCO INC.
 ISSUE CITATION-ELIZABETH ARDEN, INC.
 ISSUE CITATION-GLAXOSMITHKLINE LLC
 ISSUE CITATION-H-E-B., LP
 ISSUE CITATION-MERCK & CO., INC.
 ISSUE CITATION-PFIZER INC,
 ISSUE CITATION-SANOFI-AVENTIS U.S., LLC
 ISSUE CITATION-SPECIALTY MINERALS INC.
 PAYMENT OF ADDITIONAL FEES
 ISSUE CITATION COMM OF INS OR SOS-BAYER CONSUMER CARE HOLDINGS LLC
 ISSUE CITATION COMM OF INS OR SOS-GSK CONSUMER HEALTH, INC.
 ISSUE CITATION COMM OF INS OR SOS- HIMMEL MANAGEMENT CO LLC
 ISSUE CITATION COMM OF INS OR SOS- L'OREAL USA, INC.

ISSUE CITATION COMM OF INS OR SOS- MAYBELLINE LLC
ISSUE CITATION COMM OF INS OR SOS-BLOCK DRUG CORPORATION
ISSUE CITATION COMM OF INS OR SOS-BRENNTAG NORTH AMERICA, INC.
ISSUE CITATION COMM OF INS OR SOS-CHARLES B. CHRYSSTAL COMPANY, INC.
ISSUE CITATION COMM OF INS OR SOS-COSMETICS SPECIALTIES, INC.
ISSUE CITATION COMM OF INS OR SOS-COTY, INC.
ISSUE CITATION COMM OF INS OR SOS-CROWN LABORATORIES, INC.
ISSUE CITATION COMM OF INS OR SOS-DR. SCHOLL'S LLC
ISSUE CITATION COMM OF INS OR SOS-FISONS CORPORATION
ISSUE CITATION COMM OF INS OR SOS-NINA RICCI USA, INC.
ISSUE CITATION COMM OF INS OR SOS-NOVARTIS CORPORATION
ISSUE CITATION COMM OF INS OR SOS-NOXELL CORPORATION
ISSUE CITATION COMM OF INS OR SOS-THE PROCTER & GAMBLE COMPANY
ISSUE CITATION COMM OF INS OR SOS-PTI UNION , LLC
ISSUE CITATION COMM OF INS OR SOS-PUIG USA INC.
ISSUE CITATION COMM OF INS OR SOS-REVLON CONSUMER PRODUCTS CORPORATION
ISSUE CITATION COMM OF INS OR SOS-SANOFI US SERVICES,INC.
ISSUE CITATION COMM OF INS OR SOS-SCHOLL'S WELLNESS COMPANY LLC
ISSUE CITATION COMM OF INS OR SOS-UNILEVER UNITED STATES,INC.
ISSUE CITATION COMM OF INS OR SOS-WHITTAKER CLARK & DANIELS, INC.
REQUEST FOR SERVICE
CITATION EXCUTED HIMMEL MANAGEMENT CO LLC
EXCUTED CITATION L'OREAL USA INC
EXCUTED CITATION MAYBELLINE LLC
EXCUTED CITATION MERCK & CO INC
EXCUTED CITATION NINA RICCI USA INC
EXCUTED CITATION NOVARTIS CORPORATION
EXCUTED CITATION NOXELL CORPORATION
EXCUTED CITATION PIFIZER INC
EXCUTED CITATION THE PROCTER & GAMBLE COMPANY
EXCUTED CITATION PTI UNION LLC
EXCUTED CITATION PUIG USA INC
EXCUTED CITATION REVOLN CONSUMER PRODUCTS CORPORATION
EXCUTED CITATION SANOFI- AVENTIS US LLC
EXCUTED CITATION SANOFI US SERVICES INC
Affidavit of Service-Scholls Wellness Company LLC-5164.pdf
Affidavit of Service-Specialty Minerals Inc-5165.pdf
EXCUTED CITATION UNILEVER UNITED STATES INC
EXCUTED CITATION WHITTAKER CLARK & DANIELS INC
EXECUTED CITATION - BROOKSHIRE GROCERY COMPANY
EXECUTED CITATION - H-E-B, LP

EXECUTED CITATION - AMWAY CORP
EXECUTED CITATION - ARKEMA INC
EXECUTED SOS CITATION - AVENTIS INC
EXECUTED CITATION - AVON PRODUCTS INC
EXECUTED CITATION - BARRETTS MINERALS INC
EXECUTED SOS CITATION - BAYER CONSUMER CARE HOLDINGS LLC
EXECUTED CITATION - BAYER HEALTHCARE LLC
EXECUTED CITATION - BLOCK DRUG COMPANY INC
EXECUTED SOS CITATION - BLOCK DRUG CORPORATION
EXECUTED SOS CITATION - BRENNETAG NORTH AMERICA INC
EXECUTED CITATION - BRENNETAG SPECIALTIES LLC
EXECUTED SOS CITATION - CHARLES B CHRYSAL COMPANY INC
EXECUTED CITATION - CHATTEM INC
EXECUTED CITATION - COLGATE-PALMOLIVE COMPANY
EXECUTED CITATION - CONOPCO INC
EXECUTED SOS CITATION - COSMETIC SPECIALTIES INC
EXECUTED SOS CITATION - COTY INC
EXECUTED SOS CITATION - CROWN LABORATORIES INC
EXECUTED SOS CITATION - DR SCHOLLS LLC
EXECUTED CITATION - ELIZABETH ARDEN INC
EXECUTED SOS CITATION - FISONS CORPORATION
EXECUTED CITATION - GLAXOSMITHKLINE LLC
EXECUTED SOS CITATION - GSK CONSUMER HEALTH INC
NOTICE OF DISMISSAL FOR WANT OF PROSECUTION
ORIGINAL ANSWER/MOTION TO TRANSFER/DISMISS/SPECIAL EXCEPTIONS
MOTION TO TRANSFER VENUE
ORIGINAL ANSWER
NOTICE OF CHANGE OF ATTORNEY OF RECORD
PROPOSED ORDER SUBSTITUTE COUNSEL
AND MOTION TRANSFER VENUE
SPECIALTY MINERALS INCL
BARRETT'S MINERALS INC.
ORIGINAL ANSWER - CHARLES B CHRYSAL COMPANY INC.
COLGATE'S ORIGINAL ANSWER AND OTHERS
ORIGINAL ANSWER - ARKEMA INC.
ORIGINAL ANSWER AND ANSWER TO ALL CROSS CLAIMS
ORIGINAL ANSWER
ORIGINAL ANSWER - FISONS
ORIGINAL ANSWER
ORIGINAL ANSWER/ MOTION TO TRANSFER VENUE/DISMIS
ORIGINAL ANSWER

ORIGINAL ANSWER - CHATTEM, INC.

ORDER - SUBSTITUTION OF COUNSEL

ORIGINAL ANSWER - MERCK AND CO., INC.

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

STYLED NAOMI WISENER V. AMWAY CORP., ET AL.

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name: Jennifer Montemayor	Email: jmontemayor@sgptrial.com	Plaintiff(s)/Petitioner(s): Naomi Wisener	<input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____
Address: Simon Greenstone Panatier, PC 1201 Elm Street, Suite 3400	Telephone: 214-276-7680	Defendant(s)/Respondent(s): See attached list	Additional Parties in Child Support Case: Custodial Parent: _____
City/State/Zip: Dallas, TX 75270	Fax: 214-276-7699		Non-Custodial Parent: _____
Signature: S. Jennifer Montemayor	State Bar No: 24098129		Presumed Father: _____
[Attach additional page as necessary to list all parties]			

2. Indicate case type, or identify the most important issue in the case (select only 1):

Civil			Family Law	
Contract	Injury or Damage	Real Property	Marriage Relationship	Post-judgment Actions (non-Title IV-D)
<input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: <input type="checkbox"/> Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: 	<input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: <input type="checkbox"/> Other Injury or Damage: _____	<input type="checkbox"/> Eminent Domain/ Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____	<input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children	<input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocals (UIFSA) <input type="checkbox"/> Support Order
Employment	Related to Criminal Matters			
<input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: 	<input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____			
Tax	Other Family Law			
<input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax	<input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____			
Other Civil				
<input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetuate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____				
Probate & Mental Health				
<input type="checkbox"/> Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____				

3. Indicate procedure or remedy, if applicable (may select more than 1):

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
---	---	---

4. Indicate damages sought (do not select if it is a family law case):

<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000
--

TAMIE HOGUE and LACY HOGUE,

Plaintiffs,

vs.

AVON PRODUCTS, INC.
Via the Texas Secretary of State
CT Corporation System
28 Liberty St 42nd Floor
New York, NY 10005

BARRETT'S MINERALS INC.
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

BEAUTY 21 COSMETICS, INC., for its L.A. Colors line of products
Via the Texas Secretary of State
Chafe Yu Trinh
2021 S. Archibald Ave.
Ontario, CA 91761

BRENNETAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to
MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER
CLARK & DANIELS, INC.)
Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

BRENNETAG SPECIALTIES, LLC f/k/a BRENNETAG SPECIALTIES, INC. f/k/a MINERAL
PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER
CLARK & DANIELS, INC.)
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

COLOR TECHNIQUES, INC.
Via the Texas Secretary of State
Salvatore Giampapa
1202 Laurel Oak Road, Suite 205
Voorhees, NJ 08043

COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.)

Via the Texas Secretary of State

Ronald W. Grexa

125 White Horse Pike

Haddon Heights, NJ 08035

COTY, INC. and its subsidiary NOXELL CORPORATION, for its CoverGirl line of products

Via the Texas Secretary of State

Corporation Service Company

251 Little Falls Drive

Wilmington, DE 19808

CRANE CO.

CT Corporation System

1999 Bryan Street, Suite 900

Dallas, TX 75201-3140

ESTÉE LAUDER, INC., a subsidiary of THE ESTÉE LAUDER COMPANIES, INC.

Via the Texas Secretary of State

The Prentice-Hall Corporation System, Inc.

251 Little Falls Drive

Wilmington, DE 19808

GENERAL ELECTRIC COMPANY

CT Corporation System

1999 Bryan Street, Suite 900

Dallas, TX 75201-3140

KELLY MOORE PAINT CO., INC.

Via the Texas Secretary of State

Bill D. Fountain

1 Post Street, Suite 2400

San Francisco, CA 94104

MARKWINS BEAUTY BRANDS, INC. (sued individually and as successor-in-interest to AM COSMETICS) for its Wet N Wild line of products

Via the Texas Secretary of State

Lena Chen

22067 Ferraro

Walnut, CA 91789-5214

MARY KAY INC.

CT Corporation System

1999 Bryan Street, Suite 900

Dallas, TX 75201-3140

MAYBELLINE LLC
Via the Texas Secretary of State
Corporation Service Company
80 State Street
Albany, NY 12207

NOXELL CORPORATION, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of products
Via the Texas Secretary of State
CSC Lawyers Incorporating Service Co.
7 St. Paul St., Ste. 820
Baltimore, MD 21202

PFIZER INC.
CT Corporation Service
1999 Bryan Street, Suite 900
Dallas, TX 75201

PHYSICIANS FORMULA, INC.
Via the Texas Secretary of State
CT Corporation System
28 Liberty Street
New York, NY 10005

PRESPERSE CORPORATION
Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

PRESPERSE INTERNATIONAL CORP
Via the Texas Secretary of State
CT Corporation System
820 Bear Tavern Road
W. Trenton, NJ 08628

REVLON CONSUMER PRODUCTS CORPORATION
Via the Texas Secretary of State
Corporate Creations Network Inc.
3411 Silverside Road, Tatnall Building, Suite 104
Wilmington, DE 19810

SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.)
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

THE PROCTER & GAMBLE COMPANY (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY) for its CoverGirl line of products)

Via the Texas Secretary of State
CT Corporation System
4400 Easton Commons Fleet 125
Columbus Ohio 43219

UNION CARBIDE CORPORATION
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

WHITTAKER CLARK & DANIELS, INC.
Via the Texas Secretary of State
Joe Cobuzio
in care of Tompkins, McGuire, Wacenfeld, et al.
3 Becker Farm Road, 4th Floor
Roseland, NJ 07068

DC-21-12258

CAUSE NO: _____

NAOMI WISENER, § IN THE DISTRICT COURT
§
§ *Plaintiff,* § 14th
vs. §
§
AMWAY CORP.; §
ARKEMA, INC. f/k/a PENNWALT §
CORPORATION and ELF ATOCHEM §
NORTH AMERICA, INC. (sued individually §
and as successor-by-merger to WALLACE & §
TIERNAN d/b/a WTS PHARMACRAFT) for §
its Desenex line of products; §
AVENTIS INC., for its Desenex line of §
products; §
AVON PRODUCTS, INC.; §
BARRETTS MINERALS INC.; §
BAYER CONSUMER CARE HOLDINGS §
LLC f/k/a BAYER CONSUMER CARE LLC §
f/k/a MSD CONSUMER CARE, INC.) for its §
Dr Scholl's line of products; §
BAYER HEALTHCARE LLC, a subsidiary §
of BAYER AG. for its Dr. Scholl's line of §
products; §
BLOCK DRUG COMPANY, INC. (sued §
individually and as successor-in-interest to §
THE GOLD BOND STERILIZING §
POWDER COMPANY a/k/a THE GOLD §
BOND COMPANY); §
BLOCK DRUG CORPORATION (sued §
individually and as successor-in-interest to §
THE GOLD BOND STERILIZING §
POWDER COMPANY a/k/a THE GOLD §
BOND COMPANY); §
BRENNETAG NORTH AMERICA, INC. §
(sued individually and as successor-in-interest §
to MINERAL PIGMENT SOLUTIONS, INC. §
and as successor-in-interest to WHITTAKER §
CLARK & DANIELS, INC.); §
BRENNETAG SPECIALTIES LLC f/k/a §
BRENNETAG SPECIALTIES, INC. f/k/a §
MINERAL PIGMENT SOLUTIONS, INC. §
(sued individually and as successor-in-interest §
to WHITTAKER CLARK & DANIELS, §
INC.); §

BROOKSHIRE GROCERY COMPANY;	§
CHARLES B. CHRYSSTAL COMPANY,	§
INC.;	§
CHATTEM, INC. a subsidiary of SANOFI-AVENTIS U.S. LLC (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);	§
COLGATE-PALMOLIVE COMPANY , for its Cashmere Bouquet line of products;	§
CONOPCO, INC. d/b/a UNILEVER HOME & PERSONAL CARE USA (sued individually and as successor-in-interest to ELIZABETH ARDEN, INC.) for its White Shoulders, White Diamonds, and Elizabeth Arden lines of products;	§
COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.);	§
COTY, INC. (sued individually and for its subsidiary NOXELL CORPORATION) for its Coty and CoverGirl line of products;	§
CROWN LABORATORIES, INC. , for its Desenex line of products;	§
DR. SCHOLL'S LLC;	§
ELIZABETH ARDEN, INC. , a division of REVLON, INC., for its White Shoulders and White Diamonds lines of products;	§
FISONS CORPORATION , for its Desenex line of products;	§
GLAXOSMITHKLINE LLC (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);	§
GSK CONSUMER HEALTH, INC. f/k/a NOVARTIS CONSUMER HEALTH, INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products;	§
H-E-B, LP;	§
HIMMEL MANAGEMENT CO. LLC a/k/a HIMMEL GROUP formerly d/b/a MARTIN HIMMEL, INC. (sued individually and as	§

successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY);
L'OREAL USA, INC.;
MAYBELLINE LLC;
MERCK & CO., INC., for its Dr. Scholl's line of products;
NINA RICCI USA, INC. for its Nina Ricci L'Air du Temps line of products;
NOVARTIS CORPORATION (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products;
NOXELL CORPORATION, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of products;
PFIZER INC.;
THE PROCTER & GAMBLE COMPANY (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY) for its CoverGirl line of products;
PTI UNION, LLC a/k/a PHARMA TECH INDUSTRIES, for its Desenex and Gold Bond lines of products;
PUIG USA, INC., for its Nina Ricci L'Air du Temps line of products;
REVLON CONSUMER PRODUCTS CORPORATION for its White Shoulders, White Diamonds, and Revlon lines of products;
SANOFI-AVENTIS U.S. LLC (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.) for its Desenex line of products;
SANOFI US SERVICES, INC. for its Desenex line of products;
SCHOLL'S WELLNESS COMPANY LLC;
SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.);

UNILEVER UNITED STATES, INC. (sued
individually and as successor-in-interest to
CHESEBROUGH MANUFACTURING
COMPANY a/k/a CHESEBROUGH-PONDS)
for its White Shoulders and White Diamonds
lines of products; and
**WHITTAKER CLARK & DANIELS,
INC.,**
Defendants.

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PLAINTIFF'S ORIGINAL PETITION AND JURY DEMAND

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff, NAOMI WISENER, who complains of the various Defendants listed below and for cause of action would show the Court and Jury as follows:

I.

1. Pursuant to T.R.C.P. 190.1, Discovery will be conducted under Level 3 (T.R.C.P. 190.4). Certain Defendants named herein reside in this County, and/or maintain offices in this County, and/or have their principal place of business in this County, and/or all or a substantial part of the acts or omissions that form the basis of this lawsuit occurred in this County, and/or are incorporated in the State of Texas, and therefore venue properly lies in this County. Certain acts or omissions, which were a proximate or producing cause of Plaintiff NAOMI WISENER's asbestos-related injuries, occurred in Texas.

2. The damages Plaintiff seeks are within the jurisdictional limits of this Court. As required by Texas Rule of Civil Procedure 47(c), Plaintiff states that she seeks monetary relief over \$1,000,000.00 for the injuries alleged in this Petition. Plaintiff further seeks any relief in equity to which she is justly entitled.

3. Plaintiff NAOMI WISENER resides at 515 Dublin Avenue, Tyler, TX 75703.

4. Defendant **AMWAY CORP.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3140. This Defendant is being sued as a manufacturer of asbestos-containing Amway eyeshadows.

5. Defendant **ARKEMA, INC.** f/k/a PENNWALT CORPORATION and ELF ATOCHEM NORTH AMERICA, INC. (sued individually and as successor-by-merger to WALLACE & TIERNAN d/b/a WTS PHARMACRAFT) for its Desenex line of products, may be served through its registered agent for service of process, Corporation Service Company d/b/a CSC-

Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

6. Although Defendant **AVENTIS INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Pennsylvania, Corporation Service Company, 2595 Interstate Drive, Suite 103, Harrisburg, PA 17110. Defendant **AVENTIS INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

7. Defendant **AVON PRODUCTS, INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a manufacturer of asbestos-containing Avon talcum powders.

8. Defendant **BARRETT'S MINERALS INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, Texas 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

9. Although Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC.) for its Dr Scholl's line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **BAYER CONSUMER CARE HOLDINGS LLC** f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC.) for its Dr Scholl's line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

10. Defendant **BAYER HEALTHCARE LLC**, a subsidiary of BAYER AG, for its Dr. Scholl's line of products, may be served through its registered agent for service of process, Corporation Service Company d/b/a Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

11. Defendant **BLOCK DRUG COMPANY, INC.** (sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY) may be served through its registered agent for service of process, Prentice-Hall Corporation System, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Gold Bond Foot Powder.

12. Although Defendant **BLOCK DRUG CORPORATION** (sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Corporation Service Company, Princeton South Corporate Center, Suite 160, 100 Charles Ewing Boulevard, Ewing, NJ 08628. Defendant **BLOCK DRUG CORPORATION** (sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Gold Bond Foot Powder.

13. Although Defendant **BRENNNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **BRENNNTAG NORTH AMERICA, INC.** (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

14. Defendant **BRENNNTAG SPECIALTIES LLC** f/k/a BRENNNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.) may be served through its registered agent

for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

15. Defendant **BROOKSHIRE GROCERY COMPANY** may be served through its registered agent for service of process, Rosemary Jones, 1600 W. Southwest Loop 323, Tyler, TX 75701-8532. This Defendant is being sued as a supplier of asbestos-containing talcum powder and cosmetic products. This Defendant is a resident of the State of Texas.

16. Although Defendant **CHARLES B. CHRYSSTAL COMPANY, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its principal place of business in Connecticut, 89 Coachlight Circle, Prospect, CT 06712. Defendant **CHARLES B. CHRYSSTAL COMPANY, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

17. Defendant **CHATTEM, INC.** a subsidiary of SANOFI-AVENTIS U.S. LLC (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY) may be served through its registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Gold Bond Foot Powder.

18. Defendant **COLGATE-PALMOLIVE COMPANY**, for its Cashmere Bouquet line of products, may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a manufacturer of asbestos-containing Cashmere Bouquet talcum powder.

19. Defendant **CONOPCO, INC.** d/b/a UNILEVER HOME & PERSONAL CARE USA (sued individually and as successor-in-interest to ELIZABETH ARDEN, INC.) for its White Shoulders and White Diamonds lines of products, may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a manufacturer of asbestos-containing White Shoulders talcum powder and White Diamonds talcum powder.

20. Although Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New Jersey, Ronald W. Grexa, 125 White Horse Pike, Haddon Heights, NJ 08035. Defendant **COSMETIC SPECIALTIES, INC.** (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

21. Although Defendant **COTY, INC.** (sued individually and for its subsidiary NOXELL CORPORATION) for its Coty and CoverGirl line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **COTY, INC.** (sued individually and for its subsidiary NOXELL CORPORATION) for its Coty and CoverGirl line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Coty Airspun Face Powder, CoverGirl pressed face powders, CoverGirl blushes, and CoverGirl eyeshadows.

22. Although Defendant **CROWN LABORATORIES, INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **CROWN LABORATORIES, INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

23. Although Defendant **DR. SCHOLL'S LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **DR. SCHOLL'S LLC** may be served through the Secretary of

State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

24. Defendant **ELIZABETH ARDEN, INC.**, a division of REVOLN, INC., for its White Shoulders and White Diamonds lines of products, may be served through its registered agent for service of process, Corporate Creations Network Inc., 5444 Westheimer Road, Suite 1000, Houston, TX 77056-5318. This Defendant is being sued as a manufacturer of asbestos-containing White Shoulders talcum powder and White Diamonds talcum powder.

25. Although Defendant **FISONS CORPORATION**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Massachusetts, Corporation Service Company, 84 State Street, Boston, MA 02109. Defendant **FISONS CORPORATION**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

26. Defendant **GLAXOSMITHKLINE LLC** (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY) may be served through its registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Gold Bond Foot Powder.

27. Although Defendant **GSK CONSUMER HEALTH, INC.** f/k/a NOVARTIS CONSUMER HEALTH, INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **GSK CONSUMER HEALTH, INC.** f/k/a NOVARTIS CONSUMER HEALTH, INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

28. Defendant **H-E-B, LP** may be served through its registered agent for service of process, Abel Martinez, 646 S. Flores Street, San Antonio, TX 78204-1219. This Defendant is being sued as a supplier of asbestos-containing talcum powder and cosmetic products. This Defendant is a resident of the State of Texas.

29. Although Defendant **HIMMEL MANAGEMENT CO. LLC** a/k/a **HIMMEL GROUP** formerly d/b/a **MARTIN HIMMEL, INC.** (sued individually and as successor-in-interest to **BLOCK DRUG CORPORATION**, successor-in-interest to **THE GOLD BOND STERILIZING POWDER COMPANY** a/k/a **THE GOLD BOND COMPANY**) has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Florida, Jeffrey S. Himmel, c/o Violetas, 221 Miracle Mile, Coral Gables, FL 33134. Defendant **HIMMEL MANAGEMENT CO. LLC** a/k/a **HIMMEL GROUP** formerly d/b/a **MARTIN HIMMEL, INC.** (sued individually and as successor-in-interest to **BLOCK DRUG CORPORATION**, successor-in-interest to **THE GOLD BOND STERILIZING POWDER COMPANY** a/k/a **THE GOLD BOND COMPANY**) may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Gold Bond Foot Powder.

30. Although Defendant **L'OREAL USA, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Prentice-Hall Corporation System, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **L'OREAL USA, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing L'Oréal pressed face powder, L'Oréal blushes, and L'Oréal eyeshadows.

31. Although Defendant **MAYBELLINE LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant **MAYBELLINE LLC** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Maybelline pressed face powder, Maybelline blushes, and Maybelline eyeshadows.

32. Defendant **MERCK & CO., INC.**, for its Dr. Scholl's line of products, may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

33. Although Defendant **NINA RICCI USA, INC.**, for its Nina Ricci L'Air du Temps line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, Corporation Service Company, 80 State Street, Albany, NY 12207. Defendant **NINA RICCI USA, INC.**, for its Nina Ricci L'Air du Temps line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Nina Ricci L'Air du Temps talcum powder.

34. Although Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in New York, The Prentice Hall Corporation System, 80 State Street, Albany, NY 12207. Defendant **NOVARTIS CORPORATION** (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

35. Although Defendant **NOXELL CORPORATION**, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Maryland, CSC Lawyers Incorporating Service Co., 7 Street Paul Street, Ste. 820, Baltimore, MD 21202. Defendant **NOXELL CORPORATION**, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of

products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing CoverGirl pressed face powder, CoverGirl blushes and CoverGirl eyeshadows.

36. Defendant **PFIZER INC.** may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

37. Although Defendant **THE PROCTER & GAMBLE COMPANY** (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY) for its CoverGirl line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Ohio, CT Corporation System, 4400 Easton Commons Fleet 125, Columbus Ohio 43219. Defendant **THE PROCTER & GAMBLE COMPANY** (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY) for its CoverGirl line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing CoverGirl pressed face powder, CoverGirl blushes and CoverGirl eyeshadows.

38. Although Defendant **PTI UNION, LLC** a/k/a PHARMA TECH INDUSTRIES, for its Desenex and Gold Bond lines of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **PTI UNION, LLC** a/k/a PHARMA TECH INDUSTRIES, for its Desenex and Gold Bond lines of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder and Gold Bond Foot Powder.

39. Although Defendant **PUIG USA, INC.**, for its Nina Ricci L'Air du Temps line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its corporate headquarters in New York, Puig USA, Inc., 183 Madison Avenue, 19th Floor, New York, NY 10016. Defendant **PUIG USA, INC.**, for its Nina Ricci L'Air du Temps line of products, may be served through the Secretary of State for the

State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Nina Ricci L'Air du Temps talcum powder.

40. Although Defendant **REVLON CONSUMER PRODUCTS CORPORATION**, for its White Shoulders, White Diamonds, and Revlon lines of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporate Creations Network, Inc., 3411 Silverside Road, Tatnall Building, Suite 104, Wilmington, DE 19810. Defendant **REVLON CONSUMER PRODUCTS CORPORATION**, for its White Shoulders, White Diamonds, and Revlon lines of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing White Shoulders talcum powder, White Diamonds talcum powder, Revlon pressed face powders, Revlon blushes, and Revlon eyeshadows.

41. Defendant **SANOFI-AVENTIS U.S. LLC** (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.) for its Desenex line of products, may be served through its registered agent for service of process, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, 211 E. 7th Street, Suite 620, Austin, TX 78701. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

42. Although Defendant **SANOFI US SERVICES, INC.**, for its Desenex line of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, Corporation Service Company, 251 Little Falls Drive, Wilmington, DE 19808. Defendant **SANOFI US SERVICES, INC.**, for its Desenex line of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Desenex Foot Powder.

43. Although Defendant **SCHOLL'S WELLNESS COMPANY LLC** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said limited liability company may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **SCHOLL'S WELLNESS COMPANY LLC** may be served through the Secretary of State for the

State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing Dr. Scholl's Foot Powder.

44. Defendant **SPECIALTY MINERALS INC.** (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.) may be served through its registered agent for service of process, CT Corporation System, 1999 Bryan Street, Suite 900, Dallas, TX 75201-3140. This Defendant is being sued as a supplier of asbestos-containing talc.

45. Although Defendant **UNILEVER UNITED STATES, INC.** (sued individually and as successor-in-interest to CHESEBROUGH MANUFACTURING COMPANY a/k/a CHESEBROUGH-PONDS) for its White Shoulders and White Diamonds lines of products, has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its registered agent in Delaware, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801. Defendant **UNILEVER UNITED STATES, INC.** (sued individually and as successor-in-interest to CHESEBROUGH MANUFACTURING COMPANY a/k/a CHESEBROUGH-PONDS) for its White Shoulders and White Diamonds lines of products, may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a manufacturer of asbestos-containing White Shoulders talcum powder and White Diamonds talcum powder.

46. Although Defendant **WHITTAKER CLARK & DANIELS, INC.** has at all times relevant to this litigation conducted business in this State and is required to maintain a registered agent for service of process, it has not designated such an agent. Therefore, said corporation may be served with process at its attorney offices in New Jersey, Joe Cobuzio, c/o Tompkins, McGuire, Wacenfeld, et al., 3 Becker Farm Road, 4th Floor, Roseland, NJ 07068. Defendant **WHITTAKER CLARK & DANIELS, INC.** may be served through the Secretary of State for the State of Texas. This Defendant is being sued as a supplier of asbestos-containing talc.

47. This action is brought and these allegations are made pursuant to Tex. Civ. Prac. & Rem. Code § 71.031.

FACTUAL SUMMARY

48. Plaintiff NAOMI WISENER alleges she was wrongfully exposed to and inhaled, ingested, or otherwise absorbed asbestos fibers, an inherently dangerous toxic substance, as follows:

a.) From approximately 1955 to 1979, Plaintiff NAOMI WISENER alleges she experienced exposure to asbestos through her late husband, C. E. Wisener, who worked as a carpenter building residential sites in various cities in Texas and New Mexico including, but not limited to, Burnet, Texas. His duties included, but were not limited to, working with and around other tradesmen applying Johns-Manville insulation products. While Plaintiff Naomi Wisener's late husband used, handled, and/or was in the vicinity of others using or handling asbestos or asbestos-containing products, dangerously high levels of asbestos fibers were released into the air at his work places. These fibers were carried home on his clothing and were frequently inhaled and ingested by Plaintiff NAOMI WISENER through direct contact with her late husband and washing his work clothes.

b.) Plaintiff alleges she experienced exposure to asbestos through her regular and frequent personal use of the following asbestos-containing products: Coty Airspun loose face powder from approximately the 1950s to the 1970s; Johnson's Baby Powder from approximately 1950 to the 1990s; Avon talcum powders from approximately the 1950s to the early 2000s; Maybelline pressed face powder, CoverGirl pressed face powder, Revlon pressed face powder, Maybelline blushes, CoverGirl blushes, Revlon blushes, Maybelline eyeshadows, CoverGirl eyeshadows, and Revlon eyeshadows from approximately the 1960s to the 1980s; Cashmere Bouquet talcum powder and Shower-to-Shower talcum powder from approximately the 1970s to the 1980s; White Shoulders talcum powder from approximately the 1970s to the 1990s; Nina Ricci L'Air du Temps talcum powder from approximately 1975 to 1989; L'Oréal pressed face powder, L'Oréal blushes and L'Oréal eyeshadows from approximately the 1980s to the 2000s; White Diamonds talcum powder in the 1990s; and Amway eyeshadows from approximately 1978 to 1982. Plaintiff was also exposed to asbestos through her regular and daily use of asbestos-containing Johnson's Baby Powder on her infant children from approximately 1950 to 1953, 1955 to 1957, and 1966 to 1968, and on her infant grandchildren from approximately 1972 to 1974, 1977 to 1981, 1986 to 1988, 1991 to 1993, and 1995 to 1997, intermittently. Additionally, Plaintiff was exposed to asbestos through her late husband, Clyde Wisener's, regular and frequent use of asbestos-containing Gold Bond foot powder, Dr. Scholl's foot powder, and Desenex foot powder from approximately the 1960s to the 2000s, all while in close proximity to Plaintiff. Plaintiff was also exposed to asbestos through her daughters', Jonna Robinson's and Roseanna

McCreary's, regular and frequent use of Nina Ricci L'Air du Temps talcum powder from approximately 1975 to 1989, all while in close proximity to Plaintiff. During these time periods, Plaintiff was also exposed to asbestos-containing talc supplied by Barretts Minerals Inc., Brenntag North America, Inc. (sued individually and as successor-in-interest to Mineral Pigment Solutions, Inc. and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Brenntag Specialties LLC f/k/a Brenntag Specialties, Inc. f/k/a Mineral Pigment Solutions, Inc. (sued individually and as successor-in-interest to Whittaker Clark & Daniels, Inc.), Charles B. Chrystal Company, Inc., Cosmetic Specialties, Inc. (sued individually and formerly d/b/a G&G Specialty Products Co.), Pfizer Inc., Specialty Minerals Inc. (sued individually and as a subsidiary of Minerals Technologies Inc.) and Whittaker Clark & Daniels, Inc., and asbestos-containing talcum powder and cosmetic products supplied by Brookshire Grocery Company and H-E-B, LP. These exposures occurred while Plaintiff and her family members resided in the following locations: Ackerly, Denver City, and Sweetwater, Texas, from approximately 1950 to 1957; Hobbs, New Mexico, from approximately 1957 to 1959; Lovington, New Mexico, from approximately 1959 to 1966; Coahoma, Texas, from approximately 1966 to 1969; Austin, Texas, from approximately 1969 to 1970; Euless, Texas, from approximately 1970 to 1971; Dallas and Houston, Texas, in approximately 1971; Danville and Abilene, Texas, in approximately 1972; Big Spring, Texas, from approximately 1972 to 1973; Carrollton, Texas, in approximately 1973; San Antonio, Texas, from approximately 1973 to 1975; Burnet, Texas, from approximately 1975 to 2010; and Tyler, Texas, from approximately 2010 to the present. Plaintiff NAOMI WISENER's regular and frequent personal use of Coty Airspun loose face powder, Johnson's Baby Powder, Avon talcum powders, Maybelline pressed face powder, CoverGirl pressed face powder, Revlon pressed face powder, Maybelline blushes, CoverGirl blushes, Revlon blushes, Maybelline eyeshadows, CoverGirl eyeshadows, Revlon eyeshadows, Cashmere Bouquet talcum powder, Shower-to-Shower talcum powder, White Shoulders talcum powder, Nina Ricci L'Air du Temps talcum powder, L'Oréal pressed face powder, L'Oréal blushes, L'Oréal eyeshadows, White Diamonds talcum powder and Amway eyeshadows, Plaintiff's regular and frequent use of Johnson's Baby Powder on her infant children, Plaintiff's intermittent use of Johnson's Baby Powder on her infant grandchildren, Plaintiff's late husband's use of asbestos-containing Gold Bond foot powder, Dr. Scholl's

foot powder, and Desenex foot powder, and Plaintiff's daughters' regular and frequent use of Nina Ricci L'Air du Temps talcum powder, all while in close proximity to Plaintiff, generated asbestos-containing dust and exposed Plaintiff NAOMI WISENER to respirable asbestos fibers.

COUNT ONE
ALLEGATIONS AGAINST MANUFACTURING AND EQUIPMENT
DEFENDANTS

49. Plaintiff NAOMI WISENER alleges she was exposed to asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or asbestos-containing cosmetic, and/or raw asbestos fiber of various kinds and grades through Plaintiff's late husband's use of asbestos-containing products, through Plaintiff's personal use of talcum powder and cosmetic products, Plaintiff's use of talcum powder on her infant children and grandchildren, and Plaintiff's late husband's and daughters' use of talcum powder products while in close proximity to Plaintiff. Each Defendant corporation or its predecessor-in-interest is, or at times material hereto, has been engaged in the mining, processing and/or manufacturing, sale and distribution of asbestos-containing products, and/or asbestos-containing talc, and/or other finished and unfinished asbestos-containing talcum powder products, and/or asbestos-containing cosmetics, and/or raw asbestos fiber of various kinds and grades (hereinafter collectively referred to as "Defendants' Products"). Plaintiff NAOMI WISENER was exposed, on numerous occasions, to Defendants' Products which were produced and/or sold by Defendants and in so doing, inhaled great quantities of asbestos fibers. Further, Plaintiff alleges as more specifically set out below, that she has suffered injuries, illnesses, and disabilities proximately caused by her exposure to Defendants' Products which were designed, manufactured and sold by Defendants. In that each exposure to Defendants' Products caused or contributed to Plaintiff NAOMI WISENER'S injuries, illnesses and disabilities, Plaintiff says that the doctrine of joint and several liabilities should be extended to apply to each Defendant herein.

50. Plaintiff NAOMI WISENER was exposed to Defendants' Products that were manufactured, designed and/or distributed by the Defendants and/or their predecessors-in-interest through Plaintiff's late husband's use, Plaintiff's personal use, Plaintiff's use on her infant children and grandchildren, and Plaintiff's family members' use of Defendants' Products while in close proximity to Plaintiff. Plaintiff would show that the defective design and condition of Defendants'

Products rendered said Products unreasonably dangerous, and that Defendants' Products were in this defective condition at the time they were designed by and/or left the hands of Defendants. Plaintiff would show that Defendants' Products were defective in the manner in which they were marketed for their failure to contain or include adequate warnings regarding potential asbestos health hazards associated with the use of or the exposure to Defendants' Products, defectively designed because they were more dangerous than would be contemplated by an ordinary user, the risks of Defendants' Products outweighed their benefits, and defectively manufactured as they failed to comply with Defendants' own specifications and protect against asbestos exposure. Plaintiff would show that this market defect rendered Defendants' Products unreasonably dangerous at the time they were designed or left the hands of the Defendants. Plaintiff would show that Defendants are liable in product liability including, but not limited to, strict product liability for the above-described defects.

51. The Defendants are or were engaged in the business of selling, manufacturing, producing, designing and/or otherwise putting into the stream of commerce Defendants' Products, and those Products, without substantial change in the condition in which they were sold, manufactured, produced, designed and/or otherwise put into the stream of commerce, were a proximate and/or producing cause of the injuries, illnesses and disabilities of Plaintiff NAOMI WISENER.

52. Defendants knew that Defendants' Products would be used without inspection for defects and, by placing them on the market, represented that they would safely do the job for which they were intended, which must necessarily include safe manipulation, installation, operation, maintenance, repair, personal use, and/or handling, and/or adequately protect the consumer against asbestos fibers liberated in the air during the manipulation of Defendants' Products.

53. Plaintiff NAOMI WISENER and her family members were unaware of the hazards and defects in Defendants' Products which made them unsafe for purposes of manipulation, installation, personal use and/or handling.

54. During the periods that Plaintiff NAOMI WISENER was exposed to Defendants' Products which were manufactured and sold by various Defendants, those Products were being utilized in a manner which was intended by Defendants.

55. In the event that Plaintiff is unable to identify each injurious exposure to Defendants' Products, Plaintiff would show the Court that the Defendants named herein represent and/or represented a substantial share of the relevant market of Defendants' Products at all times material to

this cause of action. Consequently, each Defendant should be held jointly and severally liable under the doctrines of enterprise liability, market-share liability, concert of action and alternative liability, among others.

56. The injuries, illnesses and disabilities of Plaintiff NAOMI WISENER are a direct and proximate result of the negligence of each Defendant and/or its predecessor-in-interest in that said entities produced, designed, sold and/or otherwise put into the stream of commerce Defendants' Products which the Defendants knew, or in the exercise of ordinary care should have known, were deleterious and highly harmful to Plaintiff's health and well-being. Certain Defendants created hazardous and deadly conditions to which Plaintiff was exposed and which caused Plaintiff to be exposed to a large amount of asbestos fibers. The Defendants were negligent in one, some and/or all of the following respects, among others, same being the proximate cause of Plaintiff's injuries, illnesses, and disabilities:

- (a) in failing to timely and adequately warn Plaintiff NAOMI WISENER, her family members, and others of the dangerous characteristics and serious health hazards associated with exposure to Defendants' Products;
- (b) in failing to provide Plaintiff NAOMI WISENER, her family members, and others with information as to what would be reasonably safe and sufficient wearing apparel and proper protective equipment, if in truth there were any, to protect Plaintiff NAOMI WISENER and others from being harmed and disabled by exposure to Defendants' Products;
- (c) in failing to place timely and adequate warnings on the containers of Defendants' Products or on Defendants' Products themselves to warn of the dangers to health of coming into contact with Defendants' Products;
- (d) in failing to take reasonable precautions or exercise reasonable care to publish, adopt and enforce a safety plan and/or safe method of handling, utilizing and using Defendants' Products in a safe manner;
- (e) in failing to develop and utilize a substitute material or design to eliminate asbestos fibers in Defendants' Products;
- (f) in failing to properly design and manufacture Defendants' Products for safe use under conditions of use that were reasonably anticipated;

- (g) in failing to properly test Defendants' Products before they were released for consumer use; and
- (h) in failing to recall and/or remove Defendants' Products from the stream of commerce despite knowledge of the unsafe and dangerous nature of Defendants' Products.

COUNT TWO
ALLEGATIONS AGAINST SUPPLIER DEFENDANTS

57. All of the allegations contained in the previous paragraphs are realleged herein.

58. For all pertinent times, BARRETT'S MINERALS INC., BRENNTAG NORTH AMERICA, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BRENNTAG SPECIALTIES LLC F/K/A BRENNTAG SPECIALTIES, INC. F/K/A MINERAL PIGMENT SOLUTIONS, INC. (SUED INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.), BROOKSHIRE GROCERY COMPANY, CHARLES B. CHRYSTAL COMPANY, INC., COSMETIC SPECIALTIES, INC. (SUED INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY PRODUCTS CO.), H-E-B, LP, PFIZER INC., SPECIALTY MINERALS INC. (SUED INDIVIDUALLY AND AS A SUBSIDIARY OF MINERALS TECHNOLOGIES INC.) and WHITTAKER CLARK & DANIELS, INC. (hereinafter collectively referred to as "Supplier Defendants") individually sold, distributed, and supplied asbestos-containing talc, and/or asbestos-containing products, and/or asbestos-containing cosmetics (hereinafter "Supplier Defendants' Products") that Plaintiff NAOMI WISENER came in contact with and inhaled, thereby causing her injuries, illnesses and disabilities.

59. Supplier Defendants as manufacturers, miners, shippers, distributors, and suppliers of Supplier Defendants' Products, and/or owned and/or operated by asbestos product manufacturers are liable to Plaintiff for their failure to warn of the health hazards of exposure to asbestos and failure to design and package their products so as to adequately protect and warn users and bystanders of the dangers of exposure to asbestos.

60. Further, Supplier Defendants are liable to Plaintiff NAOMI WISENER as professional vendors of Supplier Defendants' Products, and as such, because of the Defendants' size, volume of business and merchandising practices, knew or should have known of the defects of the

Supplier Defendants' Products they sold and/or supplied, and are strictly liable and negligent for failing to warn users and bystanders of potential health hazards from the use of said products.

61. Further, Supplier Defendants made misrepresentations regarding the safety of asbestos to the asbestos-product manufacturers, thereby fraudulently inducing other sophisticated users to use Supplier Defendants' asbestos-containing talc, and/or asbestos-containing products, and/or raw asbestos fibers of various kinds and grades instead of other types. As such, Supplier Defendants are liable to Plaintiff NAOMI WISENER for her suffering and injuries from a disease caused by exposure to Supplier Defendants' Products because Supplier Defendants' fraudulent misrepresentations were detrimentally relied upon (1) by asbestos-product manufacturers incorporating Supplier Defendants' asbestos-containing talc and/or raw asbestos fibers of various kinds and grades into their finished products and (2) by Plaintiff NAOMI WISENER who was exposed to Supplier Defendants' Products.

62. Finally, Supplier Defendants are liable to Plaintiff because they knew or should have known that the Supplier Defendants' Products which they sold and supplied were unreasonably dangerous in normal use, and their failure to communicate this information constitutes negligence. This negligence was the cause of Plaintiff NAOMI WISENER'S illnesses, injuries and disabilities including, but not limited to, asbestos-related mesothelioma and other ill health effects.

COUNT THREE
CONSPIRACY ALLEGATIONS AGAINST ALL DEFENDANTS

63. All of the allegations contained in the previous paragraphs are realleged herein.

64. Plaintiff further alleges that Defendants and/or their predecessors-in-interest knowingly agreed, contrived, combined, confederated and conspired among themselves and with other entities to cause Plaintiff NAOMI WISENER'S illnesses, injuries and disabilities by exposing her to harmful and dangerous Defendants' Products. Defendants and other entities further knowingly agreed, contrived, combined, confederated and conspired to deprive Plaintiff NAOMI WISENER and her family members of the opportunity of informed free choice as to whether to use Defendants' Products or to expose themselves to said dangers. Defendants committed the above-described wrongs by willfully misrepresenting and suppressing the truth as to the risks and dangers associated with the use of and exposure to Defendants' Products.

65. In furtherance of said conspiracies, Defendants performed the following overt acts:

- (a) for many decades, Defendants individually, jointly, and in conspiracy with each other and other entities have been in possession of medical and scientific data, literature and test reports, which clearly indicated that the inhalation of asbestos dust and fibers resulting from the ordinary and foreseeable use of Defendants' Products was unreasonably dangerous, hazardous, deleterious to human health, carcinogenic, and potentially deadly;
- (b) despite the medical and scientific data, literature and test reports possessed by and available to Defendants, Defendants individually, jointly, and in conspiracy with each other and other entities fraudulently, willfully, and maliciously:
 - (1) withheld, concealed, and suppressed said medical and scientific data, literature and test reports regarding the risks of cancer, mesothelioma and other illnesses and diseases from Plaintiff NAOMI WISENER and her family members who were using and being exposed to Defendants' Products;
 - (2) caused to be released, published and disseminated medical and scientific data, literature and test reports containing information and statements regarding the risks of cancer, mesothelioma and other illnesses and diseases which Defendants knew were incorrect, incomplete, outdated and misleading; and
 - (3) distorted the results of medical examinations conducted upon individuals such as Plaintiff NAOMI WISENER, who were using or in close proximity to Defendants' Products and being exposed to the inhalation of asbestos dust and fibers, by falsely stating and/or concealing the nature and extent of the harm to which Plaintiff and others such as Plaintiff have suffered.
- (c) Other conspirators participating in the conspiracy, or in ongoing or subsequent conspiracies (hereinafter called the "conspirators"), were member companies in the Quebec Asbestos Mining Association, and/or Asbestos Textile Institute, and/or the Industrial Hygiene Foundation, and/or the Cosmetic Toiletry and Fragrance Association (now Personal Care Products

Council). Acting in concert, the conspirators fraudulently misrepresented to the public and public officials, *inter alia*, that asbestos did not cause cancer and that the disease asbestosis had no association with pleural and pulmonary cancer and affirmatively suppressed information concerning the carcinogenic and other adverse effects of asbestos exposure on the human respiratory and digestive systems.

- (d) In addition, Defendants contrived, combined, confederated and conspired through a series of industry trade meetings and the creation of organizations such as the Air Hygiene Foundation (later the Industrial Hygiene Foundation) to establish authoritative standards for the control of industrial dusts which would act as a defense in personal injury lawsuits, despite knowing that compliance with such standards would not protect individuals such as Plaintiff NAOMI WISENER from contracting an asbestos-related disease or cancer.
- (e) In furtherance of said conspiracies, Defendants and/or their co-conspirators contributed to cause the establishment of a Threshold Limit Value for asbestos exposure, and contributed to the maintenance of such Threshold Limit Value despite evidence that this supposed “safe” level of exposure to asbestos would not protect the health of individuals such as Plaintiff NAOMI WISENER even if complied with.
- (f) As the direct and proximate result of the false and fraudulent representations, omissions and concealments set forth above, Defendants individually, jointly, and in conspiracy with each other intended to induce Plaintiff NAOMI WISENER and her family members to rely upon said false and fraudulent representations, omissions and concealments, to continue to expose themselves to the dangers inherent in the use of and exposure to Defendants' Products, which caused the release of respirable asbestos fibers.

66. Plaintiff NAOMI WISENER and her family members reasonably and in good faith relied upon the false and fraudulent representations, omissions and concealments made by Defendants regarding the nature of Defendants' Products.

67. As a direct and proximate result of Plaintiff NAOMI WISENER's and her family members reliance on Defendants' false and fraudulent representations, omissions and concealments, Plaintiff NAOMI WISENER sustained damages including injuries, illnesses and disabilities and was deprived of the opportunity of informed free choice in connection with the use of and exposure to Defendants' Products.

COUNT FOUR

GROSS NEGLIGENCE/MALICE ALLEGATIONS AGAINST ALL DEFENDANTS

68. All of the allegations contained in the previous paragraphs are realleged herein.

69. The actions and inactions of Defendants and their predecessors-in-interest, as specifically alleged hereinabove, whether taken separately or together, were of such a character as to constitute a pattern or practice of gross negligence, intentional wrongful conduct and/or malice resulting in damages and injuries to Plaintiff NAOMI WISENER. Defendants' conduct was specifically intended by Defendants to cause substantial injury to Plaintiff, or was carried out by Defendants with a conscious and flagrant disregard for the rights, safety and welfare of others and with actual awareness on the part of Defendants that the conduct would, in reasonable probability, result in human deaths and/or great bodily harm. More specifically, Defendants and their predecessors-in-interest consciously and/or deliberately engaged in oppression, fraud, willfulness, wantonness and/or malice with regard to Plaintiff NAOMI WISENER and should be held liable in punitive and exemplary damages to Plaintiff.

COUNT FIVE

AIDING AND ABETTING ALLEGATIONS AGAINST ALL DEFENDANTS

70. All of the allegations contained in the previous paragraphs are realleged herein.

71. The actions of all Defendants aided, abetted, encouraged, induced or directed the negligent and/or intentional acts of each and every other Defendant.

72. Each of the Defendants knew or should have known that its individual actions would combine to cause the injuries, illnesses and disabilities of Plaintiff NAOMI WISENER.

73. The actions of each of the Defendants is a proximate cause of Plaintiff NAOMI WISENER'S injuries, illnesses and disabilities. As a result, all Defendants are jointly liable for the damage caused by their combined actions.

COUNT SIX
NEGLIGENCE PER SE ALLEGATIONS AGAINST ALL DEFENDANTS

74. All of the allegations contained in the previous paragraphs are realleged herein.
75. The actions of all Defendants also constituted negligence per-se.
76. Each Defendant violated federal and state regulations relating to asbestos exposure.

Such violations constitute negligence per-se or negligence as a matter of law. Further, each such violation resulted in dangerous and unlawful exposures to asbestos for Plaintiff NAOMI WISENER. Plaintiff is not making any claims under federal law; instead, Plaintiff is simply using the violation of federal standards as proof of liability on her state-law theories. Further, the reference to Federal regulations does not create a Federal question. See *Merrell Dow Pharmaceuticals, Inc. v. Thompson*, 478 U.S. 804 (1986). Any removal on this basis will be met with an immediate motion for remand and for sanctions.

77. The negligence per-se of each Defendant was a proximate cause of Plaintiff NAOMI WISENER'S injuries, illnesses and disabilities.

COUNT SEVEN
FRAUD

78. All of the allegations contained in the previous paragraphs are realleged herein.
79. **Fraudulent Misrepresentation:** All Defendants are liable for their fraudulent misrepresentations:
 - (a) First, each of these Defendants, via its employees, agents, advertisements, or any other authorized person or document, represented that certain facts were true when they were not, and made material representations that were false. The specific identities of these employees, agents, advertisements, or any other authorized person or document are maintained in Defendants' records. Such records remain in the exclusive control of Defendants pursuant to Defendants' respective document-retention policies. While Plaintiff does not currently know all of the specific advertisements, or the names of all of the employees, agents, or any other authorized person who made the representations, Plaintiff will have access to this information once discovery has commenced and will be able to specifically name the advertisements as well as the employees, agents, or any other authorized persons.

- (b) Second, Defendants represented that the asbestos-containing products they manufactured, supplied, or specified for use were not hazardous to humans. These representations, including material misrepresentations, were made before and during the years that Plaintiff NAOMI WISENER and her family members purchased, used, and Plaintiff was exposed to asbestos from Defendants' Products. Such representations were made either directly to Plaintiff, her family members, or to a third party intending and reasonably expecting that the substance of those representations would be repeated to Plaintiff and her family members.
- (c) Third, Defendants knew that the representations were false when they made them, or they made the representations recklessly and without regard for their truth. Defendants representations and conduct were false statements and representations of fact.
- (d) Fourth, Defendants intended that Plaintiff NAOMI WISENER and her family members, and/or the same class of persons as Plaintiff and her family members, rely and act on the representations or their substance.
- (e) Fifth, Plaintiff NAOMI WISENER and her family members reasonably relied on Defendants' material and false representations or the substance of those representations.
- (f) Sixth, Plaintiff NAOMI WISENER developed mesothelioma.
- (g) Seventh, Plaintiff NAOMI WISENER's justifiable reliance on those material representations was a substantial factor in causing Plaintiff's mesothelioma.

80. **Conspiracy to Commit Fraudulent Misrepresentation:** Plaintiff hereby incorporates by reference the allegations of Paragraph 79 as if fully stated herein. All Defendants are liable for their conspiracy to commit fraudulent misrepresentation.

- (a) First, Defendants were aware that their conspirators, which included all co-Defendants and others, planned to commit fraudulent misrepresentation against Plaintiff and her family members, and/or the same class of persons as Plaintiff and her family members.

- (b) Second, Defendants agreed with their conspirators and intended that the false and fraudulent misrepresentation, including material misrepresentations of fact, be committed.
- (c) Third, Plaintiff NAOMI WISENER developed mesothelioma.
- (d) Fourth, each Defendant's participation in the conspiracy was a substantial factor in causing Plaintiff's mesothelioma.

81. **Knowledge of Hazards:** At all times pertinent hereto, all Defendants owed Plaintiff NAOMI WISENER a duty, as provided for in Restatement (Second) of Torts §525-551, to abstain from injuring her person, property, or rights. In violation of that duty, these Defendants, and each of them, did do the acts and omissions, when a duty to act was imposed, as set forth herein, thereby proximately causing injury to Plaintiff. Such acts and omissions consisted of acts falling within Restatement (Second) of Torts §525-551, and more specifically were (i) suggestions of fact which were not true and which the Defendants did not believe to be true, (ii) assertions of fact of that which were not true, which the Defendants had no reasonable ground for believing it to be true, and (iii) the suppression of facts when a duty existed to disclose it, all as are more fully set forth herein, and the violation of which as to any one such item gave rise to a cause of action for violation of Plaintiff's rights as provided for in the aforementioned Restatement (Second) of Torts §525-551.

82. Since 1924, all of the Defendants have known and possessed of the true facts (consisting of medical and scientific data and other knowledge) which clearly indicated that Defendants' Products referred to herein were and are hazardous to the health and safety of Plaintiff NAOMI WISENER and others similarly situated. Defendants engaged in the following acts and omissions:

- (a) Did not label any of the aforementioned Defendants' Products as to the hazards of said Products to the health and safety of Plaintiff NAOMI WISENER, and others in Plaintiff's and her family members' positions using Defendants' Products when the knowledge of such hazards was existing and known to Defendants, and each of them, since 1924. By not labeling Defendants' Products as to their said hazards, Defendants, and each of them, caused to be suggested as a fact to Plaintiff and her family members that it was safe for them to use said Products, when in fact these things were not true and Defendants did not believe them to be true.

- (b) Suppressed information relating to the danger of using Defendants' Products by requesting the suppression of information to Plaintiff NAOMI WISENER and her family members, Plaintiff's and her family members' class of persons, and the general public concerning the dangerous nature of the Defendants' Products to all persons, including users, bystanders and household members, by not allowing such information to be disseminated in a manner which would give general notice to the public and knowledge of the hazardous nature thereof when Defendants were bound to disclose such information.
- (c) Sold Defendants' Products to the public, including Plaintiff NAOMI WISENER and her family members, and others in Texas and other states without advising them of the dangers of using and otherwise being exposed to Defendants' Products, and the dangers to those persons' family members, when Defendants knew of such dangers as set forth herein and above, and had a duty to disclose such dangers. Thus, Defendants caused to be positively asserted to Plaintiff, her family members, and the public that which was not true and which Defendants had no reasonable ground for believing to be true, in a manner not warranted by the information possessed by Defendants and each of them, of that which was and is not true, to wit, that it was safe for Plaintiff and her family members to use Defendants' Products and that they did not pose a risk of harm.
- (d) Suppressed and continue to suppress from everyone, including Plaintiff NAOMI WISENER and her family members, medical, scientific data, and knowledge of the accurate results of studies including, but not limited to, Waldemar C. Dreesen of the United States Public Health Service's 1933 report to the National Safety Council, the results of a study conducted among tremolite, talc and slate workers. The study indicated that talc was a hydrous calcium magnesium silicate, being 45% talc and 45% tremolite, and the National Safety Council stated "The results of the study seemed to indicate a relationship between the amount of dust inhaled and the effect of this dust on the lungs of the workers." As early as 1934, the National Safety Council was

publishing information stating that "a cause of severe pulmonary injury is asbestos, a silicéte of magnesium." In the September 1935 issue of National Safety News, an article entitled *No Halfway Measures in Dust Control* by Arthur S. Johnson reported lowered lung capacity resulting from "asbestosis" and "similar conditions" that developed "from exposure to excess of many mineral dusts relatively low in free silica content." The article further noted that claims for disabilities from workers who alleged exposure to "clay, talc, emery, and carborundum dusts" had "claims prosecuted successfully." The article concluded that "[i]n the absence of adequate diagnoses, occupational histories and a more satisfactory method of adjudicating claims than prosecution at common law, we must conclude that it is necessary to find a practical method for controlling all mineral dusts."

- (e) Belonged to, participated in, and financially supported the Industrial Hygiene Foundation, Asbestos Information Association, the Asbestos Textile Institute (ATI), and other industry organizations, including the Cosmetic, Toiletry, and Fragrance Association (now known as the Personal Care Products Council), which actively promoted the suppression of information of danger to users of Defendants' Products for and on behalf of Defendants, and each of them, thereby misleading Plaintiff NAOMI WISENER and her family members to their prejudice through the suggestions and deceptions set forth above in this cause of action. ATI's Dust Control Committee, which changed its name to the Air Hygiene Committee of ATI, was specifically enjoined to study the subject of dust control; discussions in such committee were held many times of (i) the dangers inherent in asbestos and the dangers which arise from the lack of control of dust and (ii) the suppression of such information from 1946 to a date unknown to Plaintiff at this time.
- (f) Knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and asbestosis in 1930 with the study of mine and mill workers at the Thetford asbestos mines in Quebec, Canada, and the study of workers at Raybestos-Manhattan plants in Manheim and Charleston, South Carolina. This information was disseminated through the

ATI and other industry organizations to all other Defendants, and each of them herein. Between 1942 and 1950, Defendants, and each of them, knew and possessed medical and scientific information of the connection between inhalation of asbestos fibers and cancer, which information was disseminated through the ATI and other industry organizations to all other Defendants herein. Thereby, Defendants suggested as fact that which is not true and disseminated other facts likely to and which did mislead Plaintiff NAOMI WISENER and her family members for want of communication of true facts, which consisted of the previously described medical and scientific data and other knowledge by not giving Plaintiff and her family members the true facts concerning such knowledge of danger, when Defendants were bound to disclose this information.

- (g) Failed to warn Plaintiff NAOMI WISENER and her family members, and others similarly situated regarding the nature of Defendants' Products. In 1968, a study presented at the American Industrial Hygiene Conference and published in the American Industrial Hygiene Association Journal concluded that "[all] of the 22 talcum products analyzed have a... fiber content. . . averaging 19%. The fibrous-material was predominantly talc but contained minor amounts of tremolite, anthophyllite, and chrysotile as these are often present in fibrous talc mineral deposits. Unknown significant amounts of such materials in products that may be used without precautions may create an unsuspected problem." [Cralley, L.J., et al.; *Fibrous and Mineral Content of Cosmetic Talcum Products*, 29 Ant Ind. Hyg. Assoc. J.350 (1968).] Defendants failed to warn Plaintiff and others similarly situated that their Products are, among other things, dangerous when breathed and cause pathological effects without noticeable trauma, although Defendants possessed knowledge that such products were dangerous and a threat to the health of persons coming into contact therewith and under a duty to disclose this information.
- (h) Concealed from Plaintiff NAOMI WISENER and others similarly situated the true nature of their exposure, the fact that Defendants knew that exposure

to respirable asbestos meant that Plaintiff would inhale this asbestos, significantly increasing her risk of developing asbestosis, lung cancer, and mesothelioma; that Plaintiff had in fact been exposed to respirable asbestos; that the materials to which Plaintiff was exposed would cause pathological effects in the human body without noticeable or perceptible trauma to warn her of injury; and Defendants engaged in these acts and omissions while under a duty to and bound to disclose this information.

- (i) Failed to provide information to the public at large and buyers, users and physicians of Plaintiff NAOMI WISENER for the purpose of conducting physical examinations of anyone who came in contact with asbestos as to the true nature of the hazards of asbestos, in order for such physicians to diagnose and treat individuals coming into contact with asbestos, in that the materials to which Plaintiff had been exposed would cause pathological effects without noticeable trauma, even though Defendants were under a duty to supply such information and such failure was and is likely to mislead persons, including Plaintiff, as to the dangers and risk of harm to which they were exposed.
- (j) Affirmatively misrepresented that Defendants' Products were safe to use and handle, when Defendants knew such statements were false when made, or made said false statements recklessly and without regard for whether the statements were true.

83. Each of the foregoing acts, suggestions, assertions, and forbearances to act when a duty existed to act, the said Defendants and each of them, having such knowledge, knowing Plaintiff NAOMI WISENER did not have such knowledge and Plaintiff would breathe such material innocently, was done falsely and fraudulently and with full intent to induce Plaintiff to be in a dangerous environment and to cause her to remain unaware of the true facts, all in violation of Restatement (Second) of Torts §525-551.

COUNT EIGHT
BASIS FOR PUNITIVE DAMAGES

84. All of the allegations contained in the previous paragraphs are realleged herein.

85. **Malice, Oppression, and Fraud:** Plaintiff hereby incorporates by reference the allegations of all causes of action as if fully stated herein. All Defendants are liable for punitive damages because they engaged in the conduct that caused Plaintiff harm with malice, oppression, or fraud.

- (a) First, Defendants committed malice in that they acted with intent to harm when they caused Plaintiff's NAOMI WISENER's asbestos exposures, and because their conduct was despicable and was done with a willful and knowing disregard of the rights and safety of others.
- (b) Second, these Defendants committed oppression in that their conduct was despicable and subjected Plaintiff NAOMI WISENER to cruel and unjust hardship and knowingly disregarded her rights.
- (c) Third, the Defendants committed fraud in that they intentionally and fraudulently concealed and misrepresented material facts and did so intending to harm Plaintiff, or with reckless disregard for whether their fraud would harm Plaintiff.

86. These Defendants' conduct constituting malice, oppression, and fraud was committed by, authorized by, and adopted by one or more officers, directors, and managing agents within the corporate hierarchy of each Defendant, who acted on behalf of each Defendant.

87. As a direct and proximate result of such intentional conduct by Defendants, their "alternate entities", and each of them, Plaintiff NAOMI WISENER sustained the injuries, illnesses, disabilities, and damages alleged herein.

DAMAGES

88. The conduct of Defendants, as alleged hereinabove, was a direct, proximate and producing cause of the damages resulting from the asbestos-related disease of Plaintiff NAOMI WISENER, and of the following general and special damages including:

- (a) Damages to punish Defendants for proximately causing Plaintiff NAOMI WISENER'S untimely injuries, illnesses, and disabilities;
- (b) Physical pain and mental anguish sustained by Plaintiff NAOMI WISENER in the past;
- (c) Physical pain and mental anguish that Plaintiff NAOMI WISENER, in reasonable probability, will sustain in the future;

- (d) The past disfigurement suffered by Plaintiff NAOMI WISENER;
- (e) The future disfigurement that Plaintiff NAOMI WISENER will, in reasonable probability, sustain in the future;
- (f) The physical impairment sustained by Plaintiff NAOMI WISENER in the past;
- (g) The physical impairment that Plaintiff NAOMI WISENER will, in reasonable probability, sustain in the future;
- (h) The medical expenses that Plaintiff NAOMI WISENER will, in reasonable probability, sustain in the future;
- (i) Medical expenses incurred by Plaintiff NAOMI WISENER in the past;
- (j) Plaintiff NAOMI WISENER's lost earning capacity sustained in the past;
- (k) Plaintiff seeks punitive and exemplary damages.
- (l) Any and all other recoverable personal injury, survival, and/or wrongful death damages for Plaintiff and Plaintiff's heirs.

89. By their acts and omissions described herein, Defendants intentionally, knowingly and/or recklessly caused serious bodily injury to Plaintiff NAOMI WISENER within the meaning of Tex.Civ.Prac.& Rem. Code §41.008(c)(7) and Tex. Penal Code §22.04.

90. Plaintiff filed suit within two (2) years of Defendants' wrongdoing, which Defendants had and continue to wrongfully conceal.

WHEREFORE, PREMISES CONSIDERED, Plaintiff demands judgment against the Defendants, and each of them, jointly and severally, for general damages, for their costs expended herein, for interest on said judgment from the date this action accrued until paid, at the legal rate, and for such other and further relief, both at law and in equity, to which Plaintiff may show herself justly entitled.

JURY DEMAND

Plaintiff demands that all issues of fact in this case be tried to a properly impaneled jury.

Respectfully submitted,

SIMON GREENSTONE PANATIER, PC

/s/ Jennifer Montemayor
Jennifer Montemayor
State Bar No. 24098129
1201 Elm Street, Suite 3400

Dallas, Texas 75270
214-276-7680 Telephone
214-276-7699 Facsimile
jmontemayor@sgptrial.com

And

MAUNE RAICHLE HARTLEY FRENCH & MUDD, LLC

C. William Margrabe (*Pro Hac Vice Pending*)
New Jersey ID No. 221042017
150 West 30th Street, Suite 201
New York, NY 10001
Telephone: (314) 241-2003
Fax: (314) 241-4838
Email: wmargrabe@mrfhmlaw.com

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 LISA M. BARLEY (CA)
 LEAH C. KAGAN (CA, NJ, NY)
 CHARLES E. SOECHTING, JR. (PA, TX)

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 TYSON B. GAMBLE (CA, OR, WA)
 ANDREW M. GROUS (NJ, NY, PA)
 JACEY L. HORNECKER (TX)
 SEAN KERLEY (NY, SC)

SIMON GREENSTONE PANATIER

TRIAL LAWYERS

ATTORNEYS & COUNSELORS AT LAW
 A Professional Corporation
www.SGPTRIAL.com

PLEASE RESPOND TO THE TEXAS OFFICE

September 1, 2021

VIA E-FILING

Hon. Felicia Pitre
 Dallas County District Clerk
 George Allen Courts Building
 600 Commerce Street, Suite 103
 Dallas, TX 75202

Re: **REQUEST FOR CITATIONS:**
 Naomi Wisener v. Amway Corp., et al.

Dear Ms. Pitre:

Please issue 43 citations (18 to be served via the Texas Secretary of State) for the list of defendants attached to this letter for the above-referenced matter.

Please email the citations to me at mjaminet@sgptrial.com and I will attach the citations to the appropriate number of copies of the file-stamped Original Complaint and Jury Demand.

Thank you very much for your assistance in this regard. Please do not hesitate to call me at 214-687-3231 if you have any questions.

Sincerely,

/s/Mary Jaminet
 Paralegal

LOS ANGELES:
 3780 Kilroy Airport Way, Suite 540
 Long Beach, California 90806
 562-590-3400 (T)
 562-590-3412 (F)

DALLAS (Primary Office):
 1201 Elm St., Suite 3400
 Dallas, Texas 75270
 214-276-7680 (T)
 214-276-7699 (F)

NEW YORK:
 5 Penn Plaza, Suite 2308
 New York, New York 10001
 212-634-1690 (T)
 214-320-0526 (F)

AMWAY CORP.
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

ARKEMA, INC. f/k/a PENNWALT CORPORATION and ELF ATOCHEM NORTH AMERICA, INC. (sued individually and as successor-by-merger to WALLACE & TIERNAN d/b/a WTS PHARMACRAFT) for its Desenex line of products
Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701

AVENTIS INC., for its Desenex line of products
Via the Texas Secretary of State
Corporation Service Company
2595 Interstate Drive, Suite 103
Harrisburg, PA 17110

AVON PRODUCTS, INC.
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

BARRETT'S MINERALS INC.
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

BAYER CONSUMER CARE HOLDINGS LLC f/k/a BAYER CONSUMER CARE LLC f/k/a MSD CONSUMER CARE, INC.) for its Dr Scholl's line of products
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

BAYER HEALTHCARE LLC, a subsidiary of BAYER AG, for its Dr. Scholl's line of products
Corporation Service Company d/b/a Lawyers Incorporating Service Company
211 E. 7th St., Suite 620
Austin, TX 78701

BLOCK DRUG COMPANY, INC. (sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY)
Prentice-Hall Corporation System
211 E. 7th St., Suite 620
Austin, TX 78701

BLOCK DRUG CORPORATION (sued individually and as successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY)

Via the Texas Secretary of State
Corporation Service Company
Princeton South Corporate Center, Suite 160
100 Charles Ewing Boulevard
Ewing, NJ 08628

BRENNTAG NORTH AMERICA, INC. (sued individually and as successor-in-interest to MINERAL PIGMENT SOLUTIONS, INC. and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.)

Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

BRENNTAG SPECIALTIES LLC f/k/a BRENNTAG SPECIALTIES, INC. f/k/a MINERAL PIGMENT SOLUTIONS, INC. (sued individually and as successor-in-interest to WHITTAKER CLARK & DANIELS, INC.)

CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

BROOKSHIRE GROCERY COMPANY
Rosemary Jones
1600 W. Southwest Loop 323
Tyler, TX 75701-8532

CHARLES B. CHRYSSTAL COMPANY, INC.

Via the Texas Secretary of State
89 Coachlight Circle
Prospect, CT 06712

CHATTEM, INC. a subsidiary of SANOFI-AVENTIS U.S. LLC (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY)

Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701

COLGATE-PALMOLIVE COMPANY, for its Cashmere Bouquet line of products
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

CONOPCO, INC. d/b/a UNILEVER HOME & PERSONAL CARE USA (sued individually and as successor-in-interest to ELIZABETH ARDEN, INC.) for its White Shoulders, White Diamonds, and Elizabeth Arden lines of products
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

COSMETIC SPECIALTIES, INC. (sued individually and formerly d/b/a G&G SPECIALTY PRODUCTS CO.)
Via the Texas Secretary of State
Ronald W. Grexa
125 White Horse Pike
Haddon Heights, NJ 08035

COTY, INC. (sued individually and for its subsidiary NOXELL CORPORATION) for its Coty and CoverGirl line of products
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

CROWN LABORATORIES, INC., for its Desenex line of products
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

DR. SCHOLL'S LLC
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

ELIZABETH ARDEN, INC., a division of REVOLN, INC., for its White Shoulders and White Diamonds lines of products
Corporate Creations Network Inc.
5444 Westheimer Rd., Suite 1000
Houston, TX 77056-5318

FISONS CORPORATION, for its Desenex line of products
Via the Texas Secretary of State
Corporation Service Company
84 State Street
Boston, MA 02109

GLAXOSMITHKLINE LLC (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY)

Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701

GSK CONSUMER HEALTH, INC. f/k/a NOVARTIS CONSUMER HEALTH, INC. f/k/a CIBA SELF-MEDICATION, INC., for its Desenex line of products
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

H-E-B, LP
Abel Martinez
646 S. Flores Street
San Antonio, TX 78204-1219

HIMMEL MANAGEMENT CO. LLC a/k/a HIMMEL GROUP formerly d/b/a MARTIN HIMMEL, INC. (sued individually and as successor-in-interest to BLOCK DRUG CORPORATION, successor-in-interest to THE GOLD BOND STERILIZING POWDER COMPANY a/k/a THE GOLD BOND COMPANY)
Via the Texas Secretary of State
Jeffrey S. Himmel
c/o Violetas
221 Miracle Mile
Coral Gables, FL 33134

L'OREAL USA, INC.
Via the Texas Secretary of State
The Prentice-Hall Corporation System
251 Little Falls Drive
Wilmington, DE 19808

MAYBELLINE LLC
Via the Texas Secretary of State
Corporation Service Company
80 State Street
Albany, NY 12207

MERCK & CO., INC., for its Dr. Scholl's line of products
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

NINA RICCI USA, INC., for its Nina Ricci L'Air du Temps line of products
Via the Texas Secretary of State
Corporation Service Company
80 State Street
Albany, NY 12207

NOVARTIS CORPORATION (sued individually and as a successor-in-interest to CIBA-GEIGY CORPORATION and its subsidiaries CIBA CONSUMER PHARMACEUTICALS and CIBA SELF-MEDICATION, INC.) for its Desenex line of products
Via the Texas Secretary of State
The Prentice Hall Corporation System
80 State Street
Albany, NY 12207

NOXELL CORPORATION, a subsidiary of COTY INC. and f/k/a NOXZEMA CHEMICAL COMPANY, for its CoverGirl line of products
Via the Texas Secretary of State
CSC Lawyers Incorporating Service Company
7 St. Paul Street, Suite 820
Baltimore, MD 21202

PFIZER INC.
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201

THE PROCTER & GAMBLE COMPANY (sued individually and as successor-in-interest to NOXZEMA CHEMICAL COMPANY) for its CoverGirl line of products
Via the Texas Secretary of State
CT Corporation System
4400 Easton Commons Fleet 125
Columbus Ohio 43219

PTI UNION, LLC a/k/a PHARMA TECH INDUSTRIES, for its Desenex and Gold Bond lines of products
Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

PUIG USA, INC., for its Nina Ricci L'Air du Temps line of products
Via the Texas Secretary of State
Puig USA, Inc.
183 Madison Avenue, 19th Floor
New York, NY 10016

REVLON CONSUMER PRODUCTS CORPORATION, for its White Shoulders, White Diamonds, and Revlon lines of products
Via the Texas Secretary of State
Corporate Creations Network, Inc.
3411 Silverside Road
Tatnall Building, Suite 104
Wilmington, DE 19810

SANOFI-AVENTIS U.S. LLC (sued individually and as successor by merger to AVENTIS PHARMACEUTICALS INC.) for its Desenex line of products
Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company
211 E. 7th Street, Suite 620
Austin, TX 78701

SANOFI US SERVICES, INC., for its Desenex line of products
Via the Texas Secretary of State
Corporation Service Company
251 Little Falls Drive
Wilmington, DE 19808

SCHOLL'S WELLNESS COMPANY LLC
Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

SPECIALTY MINERALS INC. (sued individually and as a subsidiary of MINERALS TECHNOLOGIES INC.)
CT Corporation System
1999 Bryan Street, Suite 900
Dallas, TX 75201-3140

UNILEVER UNITED STATES, INC. (sued individually and as successor-in-interest to CHESEBROUGH MANUFACTURING COMPANY a/k/a CHESEBROUGH-PONDS) for its White Shoulders and White Diamonds lines of products
Via the Texas Secretary of State
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street, Wilmington, DE 19801

WHITTAKER CLARK & DANIELS, INC.
Via the Texas Secretary of State
Joe Cobuzio,
Tompkins, McGuire, Wacenfeld & Barry
3 Becker Farm Road, 4th Floor
Roseland, NJ 07068

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: AMWAY CORP.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: ARKEMA, INC F/K/A PENNWALT CORPORATION AND ELF ATOCHEM NORTH AMERICA, INC., INDIVIDUALLY AND AS SUCCESSOR-BY-MERGER TO WALLACE & TIERNAN D/B/A WTS PHARMACRAFT BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSCLAWYERS INCORPORATING SERVICE COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

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Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgtrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: AVON PRODUCTS, INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

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within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: BARRETT'S MINERALS INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: BAYER HEALTHCARE LLC, A SUBSIDIARY OF BAYER AG
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC-LAWYERS INCORPORATING SERVICE COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

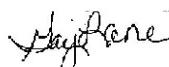
Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By 

GAY LANE

, Deputy



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

ISSUED THIS
9th day of September, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

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within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: BLOCK DRUG COMPANY INC., INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO THE
GOLD BOND STERILIZING POWDER COMPANY A/K/A THE GOLD BOND COMPANY
BY SERVING ITS REGISTERED AGENT PRENTICE-HALL CORPORATION SYSTEM
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *[Signature]*, Deputy

GAY LANE



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: BRENNETAG SPECIALTIES LLC F/K/A BRENNETAG SPECIALTIES, INC. F/K/A
MINERAL PIGMENT SOLUTIONS, INC, INDIVIDUALLY AND
AS SUCCESSOR-IN-INTEREST TO WHITTAKER CLARK & DANIELS, INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

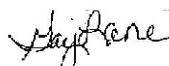
Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By 
GAY LANE

, Deputy



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: BROOKSHIRE GROCERY COMPANY
BY SERVING ROSEMARY JONES
1600 W. SOUTHWEST LOOP 323
TYLER TX 75701-8532

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *[Signature]*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgtrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
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For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: CHATTEM, INC., A SUBSIDIARY OF SANOFI-AVENTIS U.S. LLC, INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO BLOCK DRUG CORPORATION, SUCCESSOR-IN-INTEREST TO THE GOLD BOND STERILIZING POWDER COMPANY A/K/A THE GOLD BOND COMPANY
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC-LAWYERS INCORPORATING SERVICE COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgtrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
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20_____, by delivering to the within named _____

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For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: COLGATE-PALMOLIVE COMPANY
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

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For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: CONOPCO, INC. D/B/A UNILEVER HOME & PERSONAL CARE USA
INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO ELIZABETH ARDEN, INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **GAY LANE**, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
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For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: ELIZABETH ARDEN, INC., A DIVISION OF REVLON, INC.
BY SERVING ITS REGISTERED AGENT CORPORATE CREATIONS
NETWORK INC.
5444 WESTHEIMER RD., SUITE 1000
HOUSTON TX 77056-5318**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

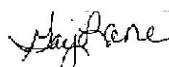
Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By 

GAY LANE

, Deputy



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
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For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: GLAXOSMITHKLINE LLC, INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO BLOCK DRUG CORPOTRION, SUCCESSOR-IN-INTEREST TO THE GOLD BOND STERILIZING POWDER COMPANY A/K/A THE GOLD BOND COMPANY BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC-LAWYERS INCORPORATING SERVICE COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

ISSUED THIS
9th day of September, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: H-E-B, LP
BY SERVING ABEL MARTINEZ
646 S FLORES STREET
SAN ANTONIO TX 78204-1219

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *[Signature]*, Deputy
GAY LANE



ESERVE
CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

ISSUED THIS
9th day of September, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: GAY LANE, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgtrial.com

DALLAS COUNTY
SERVICE FEES
NOT PAID

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: MERCK & CO., INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: PFIZER INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:
Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



**ESERVE
CITATION**

DC-21-12258

**NAOMI WISENER
vs.
AMWAY CORP., et al**

**ISSUED THIS
9th day of September, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: GAY LANE, Deputy

**Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com**

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: SANOFI-AVENTIS U.S. LLC, INDIVIDUALLY AND AS SUCCESSOR BY MERGER TO
AVENTIS PHARMACEUTICALS INC.
BY SERVING ITS REGISTERED AGENT CORPORATION SERVICE COMPANY D/B/A CSC-
LAWYERS INCORPORATING SERVICE COMPANY
211 E. 7TH STREET, SUITE 620
AUSTIN, TX 78701

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

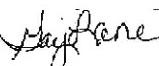
For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By  _____, Deputy

GAY LANE



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **GAY LANE**, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation \$ _____

For mileage \$ _____ of _____ County, _____

For Notary \$ _____ By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: SPECIALTY MINERALS INC, INDIVIDUALLY AND AS A SUBSIDIARY
OF MINERALS TECHNOLOGIES INC.
BY SERVING ITS REGISTERED AGENT CT CORPORATION SYSTEM
1999 BRYAN STREET SUITE 900
DALLAS TX 75201-3140**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **NAOMI WISENER**

Filed in said Court **1st day of September, 2021** against

AMWAY CORP., et al

For Suit, said suit being numbered **DC-21-12258**, the nature of which demand is as follows:

Suit on **OTHER (CIVIL)** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office this 9th day of September, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By 
GAY LANE

, Deputy



ESERVE

CITATION

DC-21-12258

NAOMI WISENER
vs.
AMWAY CORP., et al

**ISSUED THIS
9th day of September, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **GAY LANE**, Deputy

Attorney for Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

OFFICER'S RETURN

Case No. : DC-21-12258

Court No.14th District Court

Style: NAOMI WISENER

vs.

AMWAY CORP., et al

Came to hand on the _____ day of _____, 20_____, at _____ o'clock _____.M. Executed at _____,
within the County of _____ at _____ o'clock _____.M. on the _____ day of _____,
20_____, by delivering to the within named _____

each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	By _____ Deputy

(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20_____,
to certify which witness my hand and seal of office.

Notary Public _____ County _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

**To: BAYER CONSUMER CARE HOLDINGS LLC F/K/A BAYER CONSUMER CARE LLC
F/K/A MSD CONSUMER CARE INC.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----
**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

-----000000-----
a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

**To: GSK CONSUMER HEALTH, INC. F/K/A NOVARTIS CONSUMER HEALTH, INC.
F/K/A CIBA SELF-MEDICATION, INC.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

-----000000-----
**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

-----000000-----
a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

To: HIMMEL MANAGEMENT CO. LLC A/K/A HIMMEL GROUP FORMERLY D//B/A MARTIN HIMMEL, INC. INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO BLOCK DRUG CORPORATION, SUCCESSOR-IN-INTEREST TO THE GOLD BOND STERILIZING POWDER COMPANY A/K/A THE GOLD BOND COMPANY BY SERVING THE SECRETARY OF STATE OFFICE OF THE SECRETARY OF STATE CITATIONS UNIT - P.O. BOX 12079 AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE

ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**



**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by _____ delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock ____M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock ____M. by summoning the within named Corporation, _____ President - Vice President - Registered Agent - in person, of the said _____

a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____

Sheriff _____

For Mileage \$ _____

County of _____

For Notary \$ _____

State of _____

Total Fees \$ _____

By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

To: L'OREAL USA, INC.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

-----000000-----
a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

**To: MAYBELLINE LLC
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy

GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

To: BLOCK DRUG CORPORATION, INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST
TO THE GOLD BOND STERILIZING POWDER COMPANY A/K/A
THE GOLD BOND COMPANY
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

To: BRENNTAG NORTH AMERICA, INC., INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST
TO MINERAL PIGMENT SOLUTIONS, INC. AND AS SUCCESSOR-IN-INTEREST
TO WHITTAKER CLARK & DANIELS, INC.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

To: CHARLES B. CHRYSAL COMPANY, INC.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:
Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *[Signature]*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **GAY LANE**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680

jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____

**FORM NO. 3534 CITATION
THE STATE OF TEXAS**

**To: COSMETIC SPECIALTIES, INC., INDIVIDUALLY AND FORMERLY D/B/A G&G SPECIALTY
PRODUCTS CO.
BY SERVING THE SECRETARY OF STATE
OFFICE OF THE SECRETARY OF STATE
CITATIONS UNIT - P.O. BOX 12079
AUSTIN, TX, 78711**

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **ORIGINAL** petition, a default judgment may be taken against you.

In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **14th District Court** at 600 Commerce Street, Dallas Texas, 75202.

Said **PLAINTIFF** being **NAOMI WISENER**

Filed in said Court on the **1st day of September, 2021** against

AMWAY CORP., ET AL

For suit, said suit being numbered **DC-21-12258** the nature of which demand is as follows:

Suit On **OTHER (CIVIL)** etc.

as shown on said petition a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.

Given under my hand and the Seal of said Court at office **on this the 9th day of September, 2021**

ATTEST: FELICIA PITRE Clerk of the District Courts of Dallas, County, Texas

By *Gay Lane*, Deputy
GAY LANE



ESERVE (SOS)

CITATION

No.: **DC-21-12258**

NAOMI WISENER

vs.

AMWAY CORP., et al

ISSUED

**ON THIS THE 9TH DAY OF
SEPTEMBER, 2021**

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By **Gay Lane**, Deputy

Attorney for : Plaintiff
JENNIFER MONTEMAYOR
1201 ELM STREET SUITE 3400
DALLAS TX 75270
214-276-7680
jmontemayor@sgptrial.com

**DALLAS COUNTY
SERVICE FEES
NOT PAID**

**OFFICER'S RETURN
FOR INDIVIDUALS**

Cause No. DC-21-12258
Court No: 14th District Court

Style: NAOMI WISENER
vs.
AMWAY CORP., et al

Received this Citation the _____ day of _____, 20____ at _____ o'clock. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock, by delivering to the within named _____ each in person, a copy of this Citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

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**OFFICER'S RETURN
FOR CORPORATIONS**

Received this Citation the _____ day of _____, 20____ at _____ o'clock __.M. Executed at _____, within the County of _____, State of _____, on the _____ day of _____, 20____, at _____ o'clock __.M. by summoning the within named Corporation, _____

President - Vice President - Registered Agent - in person, of the said

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a true copy of this citation together with the accompanying copy of Plaintiff's original petition, having first indorsed on same the date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness by my hand.

For Serving Citation \$ _____ Sheriff _____

For Mileage \$ _____ County of _____

For Notary \$ _____ State of _____

Total Fees \$ _____ By _____

(Must be verified if served outside the State of Texas)

State of _____

County of _____

Signed and sworn to me by the said _____ before me this _____ day of _____, 20____, to certify which witness my hand and seal of office.

Seal

State & County of _____